Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

94-RPS-247

JUL 29 1994

Mr. Davild L. Lundstrom
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 1386, MSIN N1-05
Richland, Washington 99352

Dear Mr. Lundstrom:

NOTICE OF INTENT FOR EXPANSION UNDER INTERIM STATUS FOR THE HANFORD FACILITY, 242-A EVAPORATOR (WA 7890008967) (TSD: T-2-6)

In accordance with the Washington Administrative Code (WAC) 173-303-281, the U.S. Department of Energy, Richland Operations Office (RL) and Westinghouse Hanford Company (WHC) are submitting the Notice of Intent (NOI) for Expansion Under Interim Status for the Hanford Facility, 242-A Evaporator. This NOI addresses the addition of tank storage capabilities for Tank C-100 and Tank C-A-1 that support 242-A Evaporator operation. The 242-A Evaporator is located in the eastern portion of the 200 East Area of the Hanford Facility. The 242-A Evaporator is used to treat mixed waste from the Double-Shell Tank System by removing water and most volatile organics. The specific information required under WAC 173-303-281 for expansion under interim status is provided in the NOI.

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Should you have any questions regarding the NOI, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Mr. R. C. Bowman of WHC on (509) 376-4876.

Sincerely,

James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:CEC

W. T. Dixon, Manager
Regulatory Support
Westinghouse Hanford Company

Enclosure:
NOI for Expansion Under Interim
Status for the Hanford Facility,
242-A Evaporator (WA 7890008967)
(TSD: T-2-6)

cc w/encl:
Administrative Records, H6-08
D. L. Duncan, EPA
S. E. McKinney, Ecology
D. C. Nylander, Ecology

cc w/o encl:
R. C. Bowman, WHC
D. R. Sherwood, EPA
W. T. Dixon, WHC
S. M. Price, WHC

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NOTICE OF INTENT FOR EXPANSION UNDER INTERIM STATUS FOR

HANFORD FACILITY, 242-A EVAPORATOR

U.S. DEPARTMENT OF ENERGY,
RICHLAND OPERATIONS OFFICE

AUGUST 1994

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CONTENTS

APPENDICES

FIGURES

1.0 INTRODUCTION

The Washington State Department of Ecology (Ecology) *Dangerous Waste Regulations*, Washington Administrative Code (WAC) 173-303-281, require that dangerous waste facility owners and/or operators submit a Notice of Intent (NOI) before submittal of a permit application for new or expanded dangerous waste treatment, storage, and/or disposal (TSD) units on the Hanford Facility. The following information for this NOI is being filed with Ecology by the U.S. Department of Energy, Richland Operations (DOE-RL), the owner and operator.

This document is to serve notice of the intent to add greater-than-90-day tank storage to the 242-A Evaporator (tanks C-100 and C-A-1), located in the 200 East Area of the Hanford Facility, Richland, Washington. The ability to store dangerous waste in tanks is being added to ensure compliance with storage requirements and greater-than-90-day accumulation requirements of WAC 173-303 and the *Resource Conservation and Recovery Act* (RCRA) *of 1976*, as amended.

The following identifies the owner and operator of the Hanford Facility and the primary contact.

Owner and Operator: U.S. Department of Energy,
Richland Operations Office

Manager, Richland Operations Office: Mr. John D. Wagoner

Richland Operations Office Contact: Mr. J. E. Rasmussen

Address: U.S. Department of Energy
Richland Operations Office
Post Office Box 550
Richland, Washington 99352

Telephone: (509) 376-5441

2.0 FACILITY DESCRIPTION AND GENERAL PROVISIONS

The Hanford Facility is a single RCRA facility identified by the U.S. Environmental Protection Agency (EPA)/State Identification Number WA7890008967 that consists of over 60 TSD units conducting dangerous waste management activities. These TSD units are included in the *Hanford Facility Dangerous Waste Part A Permit Application* (DOE-RL 1988b). The Hanford Facility consists of all contiguous land, and structures, other appurtenances, and improvements on the land, used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of dangerous waste, which, for the purposes of the RCRA, are owned by the U.S. Government and operated by the DOE-RL (excluding lands north and east of the Columbia River, river islands,

lands owned or used by the Bonneville Power Administration, lands leased or under lease obligation to the Washington Public Power Supply System, and lands owned by or leased to the state of Washington).

The following sections provide a description of the 242-A Evaporator and tanks C-100 and C-A-1, along with other general provisions specified in WAC 173-303-281.

2.1 LOCATION OF PROPOSED EXPANSION

The 242-A Evaporator is located in the 200 East Area of the Hanford Facility, Benton County, Washington. Tanks C-100 and C-A-1 will be expanded from less-than-90-day accumulation to greater-than-90-day accumulation. Small-scale maps depicting the Hanford Facility and the location of the 242-A Evaporator are provided in Figures 1 and 2. A large-scale map and a topographic map, which meet the 1-inch-equals-not-more-than-200-feet requirement, are provided in Appendix A and include the following:

- General Overview of Hanford Site (H-6-958)

- Topographic map showing the 242-A Evaporator (H-13-000004), including surrounding 1,000 feet (305 meters). There are no existing or planned injection or withdrawal wells in the vicinity of the 242-A Evaporator. There are no barriers planned for drainage or flood control at the 242-A Evaporator.

2.2 DESCRIPTION OF UNIT TO BE EXPANDED

The 242-A Evaporator is an existing TSD unit located south of the 241-A Tank Farm and north of the 241-AW Tank Farm (Figure 2).

The 242-A Evaporator receives a mixed waste stream containing radionuclides, organic, and inorganic constituents. The 242-A Evaporator process separates the waste into the following two streams:

- One waste stream containing the majority of the radionuclides and inorganic constituents

- One waste stream containing volatile organic materials and greatly reduced concentrations of radionuclides.

Currently, the 242-A Evaporator is out of service for general maintenance and upgrades to improve process control and monitoring capability. The 242-A Evaporator is expected to return to service following completion of the upgrades and start up operations at the Liquid Effluent Retention Facility.

The 242-A Evaporator process employs a conventional forced circulation, vacuum evaporation system to concentrate mixed waste solutions. The main components include the reboiler, vapor-liquid separator, recirculation pump

and pipe loop, slurry pump, condensers, jet vacuum system, condensate collection tank (tank C-100), and ion exchange system. Figure 3 provides a simplified schematic of the process components.

The 242-A Evaporator tank storage capacity will be expanded from less-than-90-day accumulation to greater-than-90-day accumulation. Tanks C-100 and C-A-1 are designed to safely store process condensate resulting from 242-A Evaporator operations. Tank C-100 is located in the condenser room (Figure 4) and tank C-A-1 is located in the evaporator room (Figure 5).

Process condensate from the primary, inter-, and aftercondensers drain by gravity to tank C-100, which is constructed of stainless steel. In addition, tank C-100 receives potentially contaminated drainage from the vessel vent system via a 27-gallon (102-liter) seal pot (Figure 3). Tank C-100 is 14 feet (4.3 meters) in diameter and 19 feet (5.9 meters) high with a maximum capacity of 17,800 gallons (67,380 liters).

Process slurry from the reboiler discharges to the evaporator vessel, tank C-A-1, which consists of two sections. The lower (liquid) section is a 14-foot (4.3-meter) diameter stainless steel shell. Concentrated process slurry exits the lower section via the 28-inch (71-centimeter) recirculation line. The upper (vapor) section is a 11.6-foot (3.5-meter) diameter stainless steel shell. The upper section contains two wire-mesh deentrainment pads for the removal of liquids and solids that could be carried into the vapor header. Vapor flows out of tank C-A-1 through a 42-inch (107-centimeter) vapor line at the top. The maximum capacity of tank C-A-1 is 27,267 gallons (103,217 liters).

The maximum amount of waste to be managed annually in tanks C-A-1 and C-100 is approximately 92,000 gallons (348,257 liters).

The integrity of tanks C-A-1 and C-100 was assessed by leak testing, inspections, ultrasonic examination, and technical review. All applicable requirements of WAC 173-303-640 were considered (WHC 1993).

2.3 COMPLIANCE WITH STATE ENVIRONMENTAL POLICY ACT

The *State Environmental Policy Act of 1971* Environmental Checklist (Revision 1) is provided as Appendix B.

2.4 COMPLIANCE WITH SITING STANDARDS

Demonstration of compliance with the siting criteria as required under WAC 173-303-282(6) and (7) is addressed in the following sections.

2.4.1 Criteria for Elements of the Natural Environment

The following sections address measures in place at the 242-A Evaporator to provide protection of the natural environment. Each element of the criteria identified in WAC 173-303-282(6) is addressed.

2.4.1.1 Earth. This section addresses the potential for the release of mixed waste into the environment because of structural damage resulting from conditions of the earth at the 242-A Evaporator.

2.4.1.1.1 Seismic Risk. The 242-A Evaporator is located in Zone 2B as identified in the *Uniform Building Code* (ICBO 1991). The 242-A Evaporator was designed in accordance with the regulations of Section 2312 of the *Uniform Building Code* (ICBO 1991) for earthquake Zone 2. The design of the 242-A Evaporator was in accordance with the *Hanford Plant Standards*, Standard Design Criteria - 4.1 for seismic considerations (DOE-RL 1988a). The Plant Standard provides seismic load criteria specific for the Hanford Site and is more restrictive than the *Uniform Building Code*.

No active faults, or evidence of a fault that has had displacement during Holocene times, have been found at the Hanford Site (DOE 1988; WHC 1991). The youngest faults recognized at the Hanford Site occur on Gable Mountain, over 7.5 miles (12.1 kilometers) northeast of the 200 East Area. These faults are of Quaternary age and are considered 'capable' by the Nuclear Regulatory Commission (NRC 1982).

2.4.1.1.2 Subsidence. The 242-A Evaporator is located in the 200 East Area of the Hanford Facility. This area of the Hanford Facility is not considered an area subject to subsidence (PNL 1992).

2.4.1.1.3 Slope or Soil Instability. The 242-A Evaporator is not located in an area of slope or soil instability, or in an area affected by unstable slope or soil conditions (PNL 1992).

2.4.1.2 Air. The 242-A Evaporator is not an incineration unit. Discussion of measures taken to reduce air emissions resulting from incineration is not applicable.

2.4.1.3 Water. This section addresses the potential for contaminating water of the state in the event of a release of mixed waste.

2.4.1.3.1 Surface Water. The following sections address considerations for the protection of surface water.

2.4.1.3.1.1 Flood, Seiche, and Tsunami Protection. Three sources of potential flooding of the area were considered: (1) the Columbia River, (2) the Yakima River, and (3) storm-induced run-off in ephemeral streams draining the Hanford Facility. No perennial streams occur in the central part of the Hanford Facility.

The Federal Emergency Management Agency has not prepared floodplain maps for the Columbia River through the Hanford Facility. The flow of the Columbia River largely is controlled by several upstream dams that are designed to reduce major flood flows. Based on a U.S. Army Corps of Engineers study of the flooding potential of the Columbia River that considered historic data and water storage capacity of the dams on the Columbia River (COE 1969), the U.S. Department of Energy (ERDA 1976) has estimated the probable maximum flood (Figure 6). The estimated probable maximum flood would have a larger floodplain than either the 100- or 500-year flood. The 242-A Evaporator is well above the elevation of the Columbia River probable maximum flood and, therefore, is not within the 100- or 500-year floodplain.

The 100-year floodplain for the Yakima River, as determined by the Federal Emergency Management Agency (FEMA 1980), is shown in Figure 7. The 242-A Evaporator is not within the floodplain.

The only other potential source of flooding of the 242-A Evaporator is run-off from a large precipitation event in the Cold Creek watershed. This event could result in flooding of the ephemeral Cold Creek. Skaggs and Walters (1981) have estimated the probable maximum flood using conservative values of precipitation, infiltration, surface roughness, and topographic features. The resulting flood area (Figure 8) would not affect the 242-A Evaporator.

2.4.1.3.1.2 Perennial Surface Water Bodies. The 242-A Evaporator is a nonland-based facility as defined in WAC 173-303-282(3)(i). The WAC 173-303-282(6)(c)(i)(B)(I) requires nonland-based facilities be located at least 500 feet (152 meters) from any perennial water body. The 242-A Evaporator is over 6 miles (10 kilometers) from the Columbia River, the closest perennial water body.

2.4.1.3.1.3 Surface Water Supply. The 242-A Evaporator is not located within an area designated as a watershed or within 500 feet (152 meters) of a surface water intake for domestic water.

2.4.1.3.2 Groundwater. The following addresses consideration for the protection of groundwater. The 242-A Evaporator is a nonland-based facility as defined by WAC 173-303-282(3)(i); therefore, compliance with the contingent groundwater protection program is not required.

2.4.1.3.2.1 Depth to Groundwater. The 242-A Evaporator is located in the 200 East Area of the Hanford Facility. The depth to groundwater in the 200 East Area is over 260 feet (79 meters).

2.4.1.3.2.2 Sole Source Aquifer. The 242-A Evaporator is not located over an area designated as a 'sole source aquifer' under section 1424(e) of the *Safe Drinking Water Act of 1974*.

2.4.1.3.2.3 Groundwater Management Areas and Special Protection Areas. The proposed expansion involves the addition of tank storage capacity in tanks C-100 and C-A-1. The storage of waste in tanks is not expected to

result in an increased potential for release of mixed waste to groundwater and special protection areas.

2.4.1.3.2.4 Groundwater Intakes. The 242-A Evaporator is not located within 500 feet (152 meters) of a groundwater intake for domestic water.

2.4.1.4 Plants and Animals. The proposed expansion does not result in an increased potential for mixed waste to contaminate plant and animal habitat in the event of a release of mixed waste.

2.4.1.5 Precipitation. The 242-A Evaporator is not located in an area having a mean annual precipitation level of greater than 100 inches (254 centimeters) (DOE 1987).

2.4.2 Criteria for Elements of the Built Environment

The following sections address the locational factors affecting protection of the built environment. Each element of the criteria for nonland-based facilities or units identified in WAC 173-303-282(7) is addressed.

2.4.2.1 Adjacent Land Use. This section addresses the setback criteria for adjacent land use.

Nonland-Based Facilities. The 242-A Evaporator is located approximately 12 miles (19 kilometers) from the closest Hanford Facility property line.

2.4.2.2 Special Land Uses. This section addresses setback criteria for special land uses.

2.4.2.2.1 Wild and Scenic Rivers. The 242-A Evaporator is located in the 200 East Area approximately 6 miles (10 kilometers) from the Columbia River, which has been proposed as a Wild and Scenic River. The 242-A Evaporator clearly is not within the viewshed of users of the Columbia River.

2.4.2.2.2 Parks, Recreation Areas, National Monuments. The 242-A Evaporator is situated approximately 12 miles (19 kilometers) from the closest Hanford Facility boundary line and therefore is over 500 feet (152 meters) from the nearest state or federally designated park, recreation area, or national monument.

2.4.2.2.3 Wilderness Areas. The 242-A Evaporator is located approximately 12 miles (19 kilometers) from the boundary of the Hanford Facility, and is clear of any Wilderness Areas as defined by the *Wilderness Act of 1964*.

2.4.2.2.4 Farmland. The 242-A Evaporator is a minimum of 12 miles (19 kilometers) from any commercial or private prime farmland.

2.4.2.3 Residences and Public Gathering Places. This section discusses factors affecting residences and public gathering places. The 242-A Evaporator is located over 500 feet (152 meters) from residences and public gathering places.

2.4.2.3.1 Incineration. Incineration is not a process used at the 242-A Evaporator. Therefore, this criterion is not applicable.

2.4.2.3.2 Land Use Compatibility. The Hanford Facility conforms with local land use zoning designation requirements.

2.4.2.3.3 Archeological Sites and Historic Sites. No places or objects listed on, or proposed for, national, state, or local preservation registers are known to be on or next to the 242-A Evaporator. There are no known archaeological, historical, or Native American religious sites on or next to the 242-A Evaporator.

3.0 TEN-YEAR COMPLIANCE HISTORY

Appendix C summarizes Notice of Compliance Violations and the associated responses. This summary and the correspondence associated with notices of compliance violations can be obtained by contacting the following:

Public Access Room H6-08
Westinghouse Hanford Company
P.O. Box 1970
Richland, Washington 99352
(509) 372-3411.

4.0 JUSTIFICATION OF NEED

In May 1989, the U.S. Department of Energy along with Ecology and the EPA formally entered into an agreement known as the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) (Ecology et al. 1994) for the purpose of the Hanford Facility gaining compliance with federal, state, and local laws concerning the management of waste. The operation of the 242-A Evaporator supports Tri-Party Agreement milestone M-20-17 by providing a means to treat and store mixed waste.

The ability to store dangerous waste in tanks longer than 90 days is necessary because of delays in transferring liquid mixed waste to a TSD unit. Also, the liquid mixed waste is used for training and testing programs at the 242-A Evaporator. To ensure compliance with federal and state requirements for accumulation of dangerous waste, the 242-A Evaporator tanks C-100 and C-A-1 must be permitted to store dangerous waste for greater than 90 days.

5.0 IMPACT ON OVERALL CAPACITY AT THE HANFORD FACILITY AND THE STATE OF WASHINGTON

The current capacity for treating, storing, and/or disposing of mixed waste is limited within Washington State and the Hanford Facility. The 242-A Evaporator will have the means to treat and store mixed waste.

6.0 REFERENCES

6.1 DOCUMENTS

COE, 1969, *Columbia River Basin: Lower Columbia River Standard Project Flood and Probable Maximum Flood*, September 1969, Memorandum Report, U.S. Army Corps of Engineers, North Pacific, Portland, Oregon.

DOE, 1987, *Final Environmental Impact Statement: Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes*, Vol. 1-5, DOE/EIS-0113, U.S. Department of Energy, Washington, D.C.

DOE, 1988, *Site Characterization Plan, Consultation Draft*, DOE/RW-0164, Vol. 1, U.S. Department of Energy, Washington, D.C.

DOE-RL, 1988a, "Design Load for Structures," HPS-SDC-4.1, Revision 11, *Hanford Plant Standards*, U.S. Department of Energy-Richland Operations Office, Richland, Washington.

DOE-RL, 1988b, *Hanford Facility Dangerous Waste Part A Permit Application*, Vols. 1 through 3, DOE/RL 88-21, U.S. Department of Energy-Richland Operations Office, Richland, Washington.

Ecology, EPA, and DOE, 1994, *Hanford Federal Facility Agreement and Consent Order*, Washington State Department of Ecology, U.S. Environmental Protection Agency, U.S. Department of Energy, Olympia, Washington.

ERDA, 1976, *Evaluation of Impact of Potential Flooding Criteria on the Hanford Project*, RLO-76-4, U.S. Energy Research and Development Administration-Richland Operations Office, Richland, Washington.

FEMA, 1980, *Flood Insurance Study: Benton County Washington*, Federal Emergency Management Agency, Federal Insurance Administration, Washington, D.C.

ICBO, 1991, *Uniform Building Code*, International Conference of Building Officials, Whittier, California.

NRC, 1982, *Safety Evaluation Report (Related to the Operation of WPPSS Nuclear Project) No. 2*, NUREG-0892 Supplement No. 1, U.S. Nuclear Regulatory Commission, Washington, D.C.

PNL, 1992, *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415, Revision 5, Pacific Northwest Laboratory, Richland, Washington.

Skaggs, R.L. and W.H. Walters, 1981, *Flood Risk Analysis of Cold Creek Near the Hanford Site*, PNL-4219, Pacific Northwest Laboratory, Richland, Washington.

WHC, 1991, *Geology and Hydrology of the Hanford Site: A Standardized Text for Use in Westinghouse Hanford Company Documents and Reports*, WHC-SD-ER-TI-003, Westinghouse Hanford Company.

6.2 FEDERAL AND STATE ACTS

Resource Conservation and Recovery Act of 1976, as amended, 42 USC 6901 et seq.

State Environmental Policy Act of 1971, RCW 43.21c.

Safe Drinking Water Act of 1974, 42 USC 399f.

Wild and Scenic Rivers Act of 1968, as amended, 16 USC 1271.

Wilderness Act of 1964, as amended, 16 USC 1131-1136 et seq.

6.3 REVISED CODE OF WASHINGTON AND WASHINGTON ADMINISTRATIVE CODE

WAC 173-303, *Dangerous Waste Regulations*.

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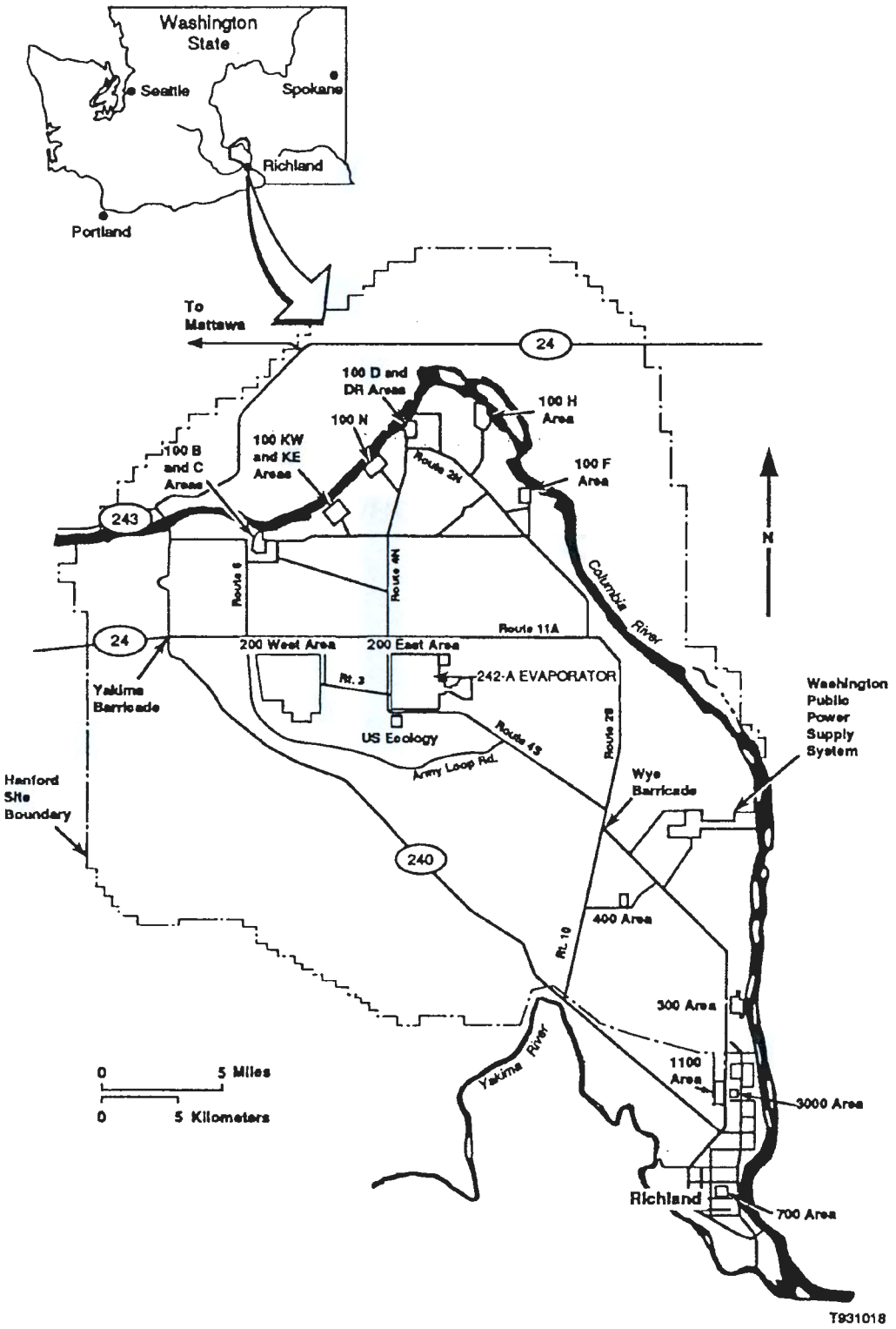

Figure 1. Hanford Site.

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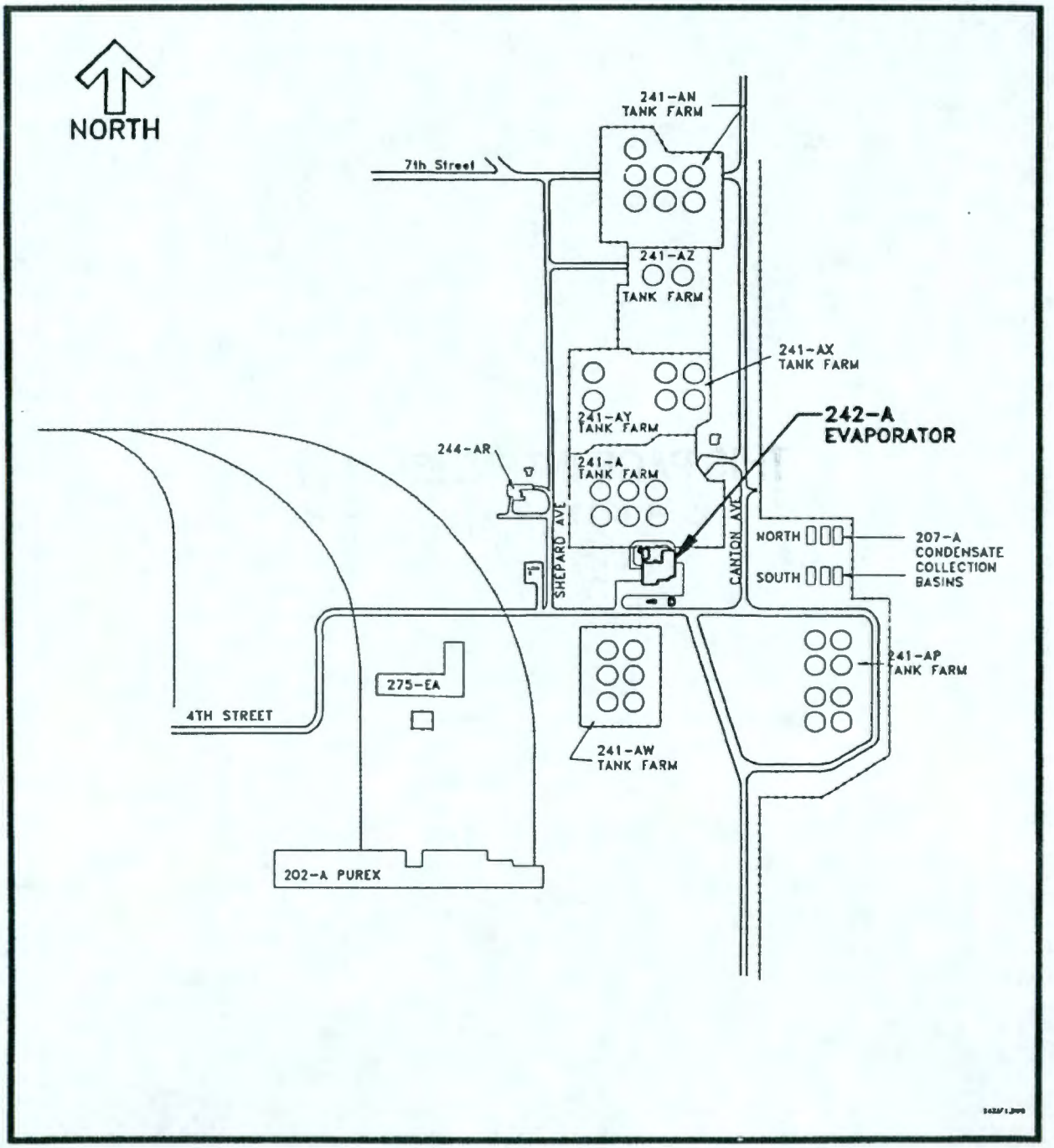

Figure 2. Location of 242-A Evaporator.

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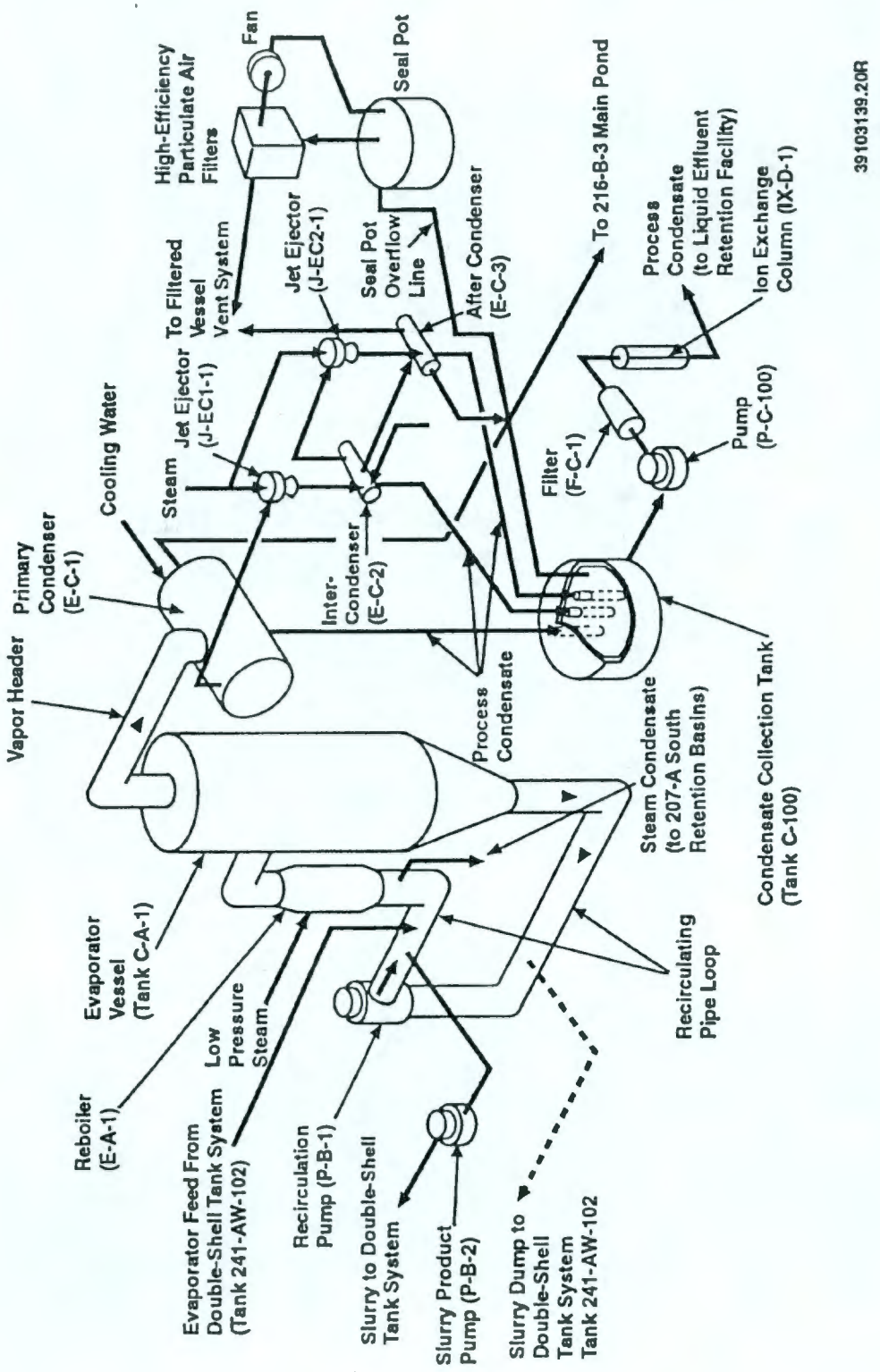

Figure 3. Principal Process Components.

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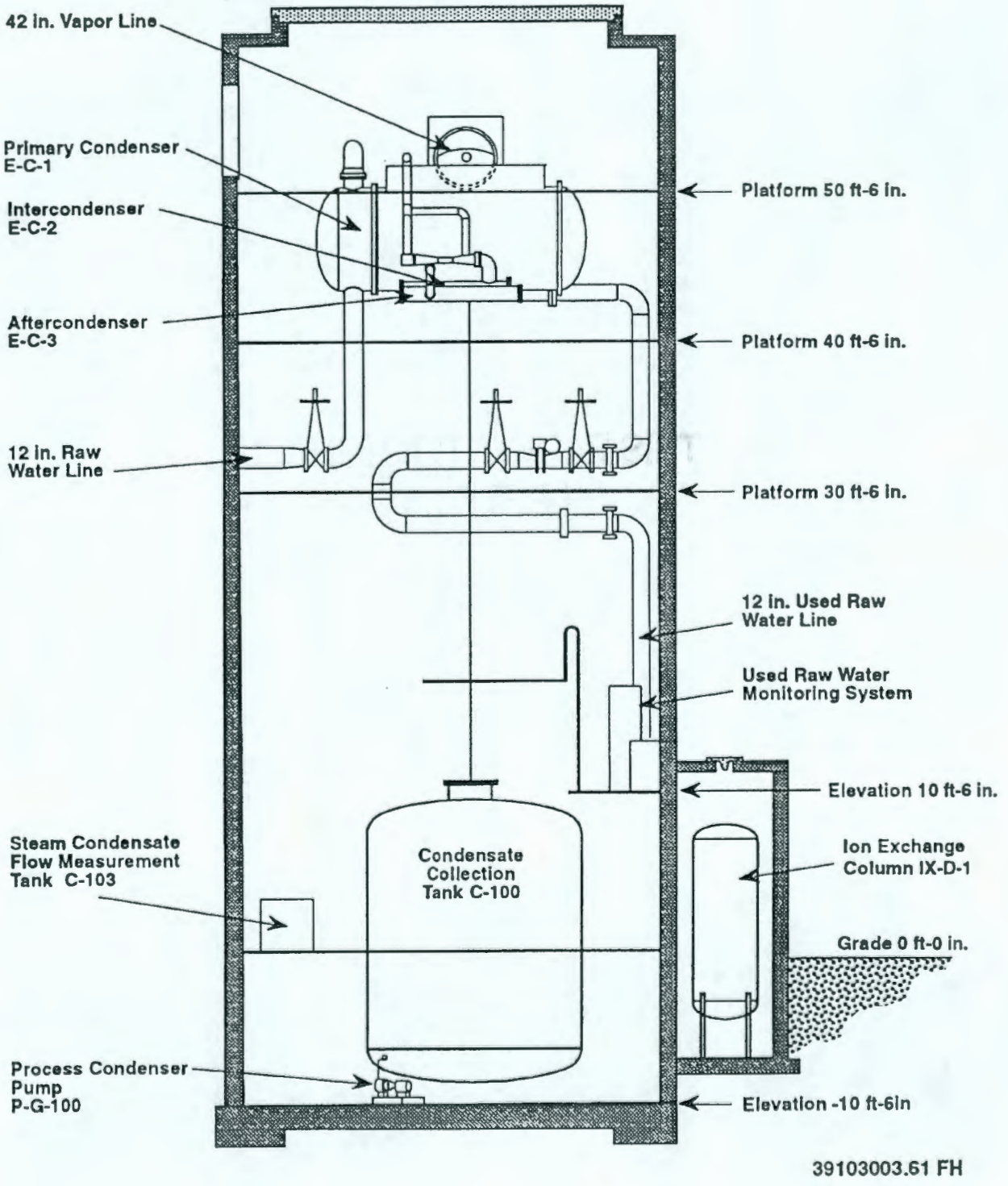

Figure 4. Location of Tank C-100 in the 242-A Evaporator Condenser Room.

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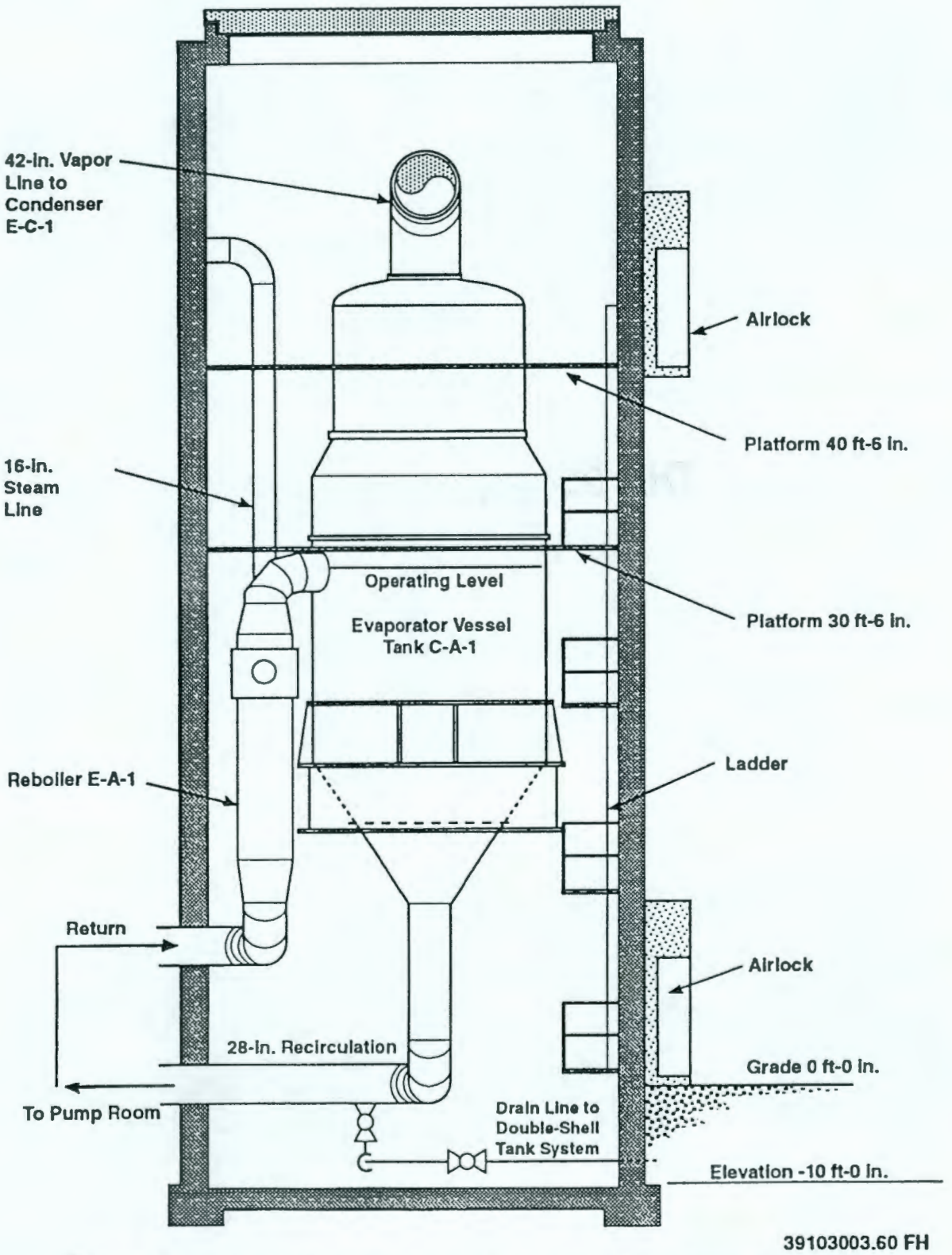

Figure 5. Location of Tank C-A-1 in the 242-A Evaporator Room.

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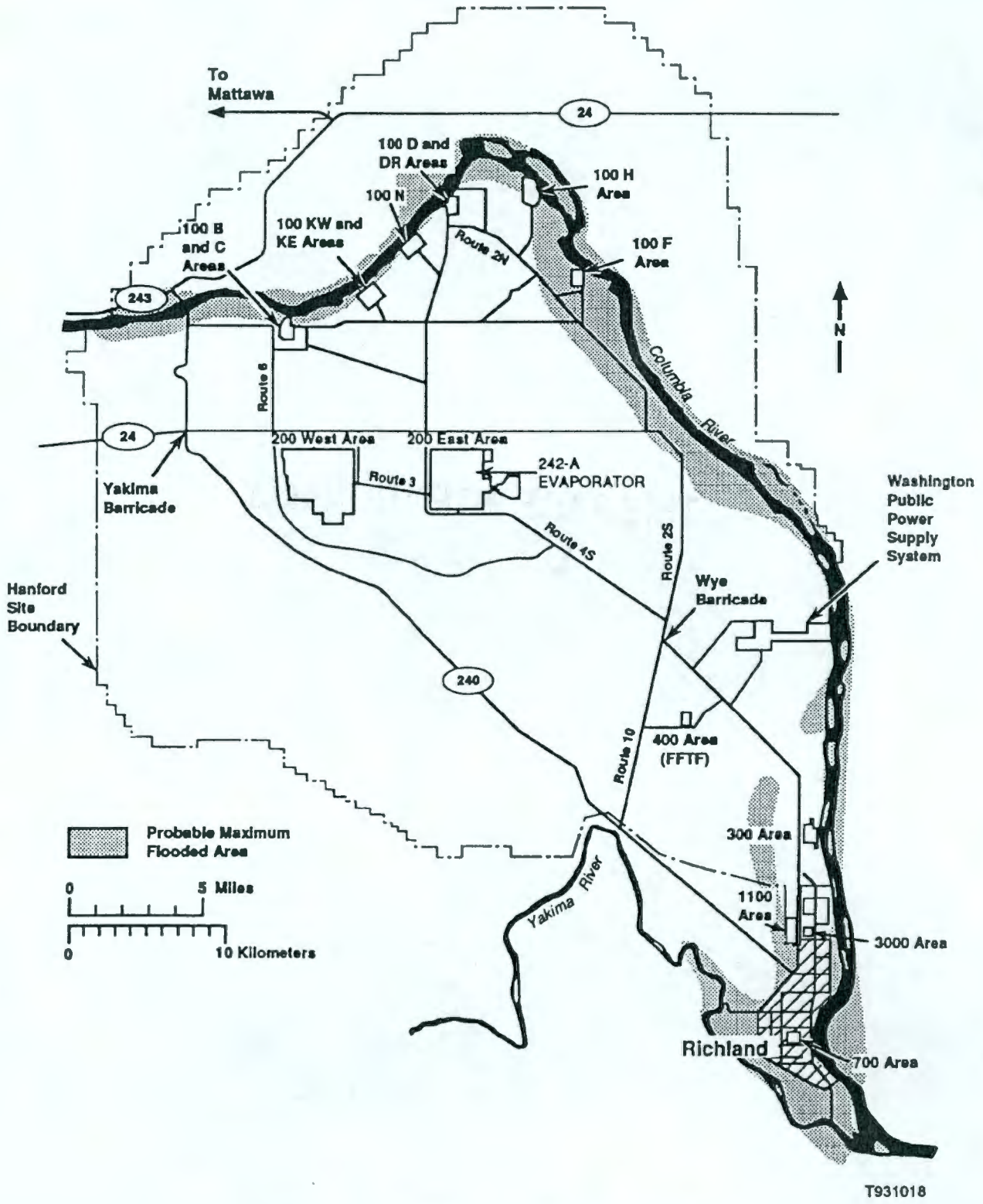

Figure 6. Columbia River Floodplain.

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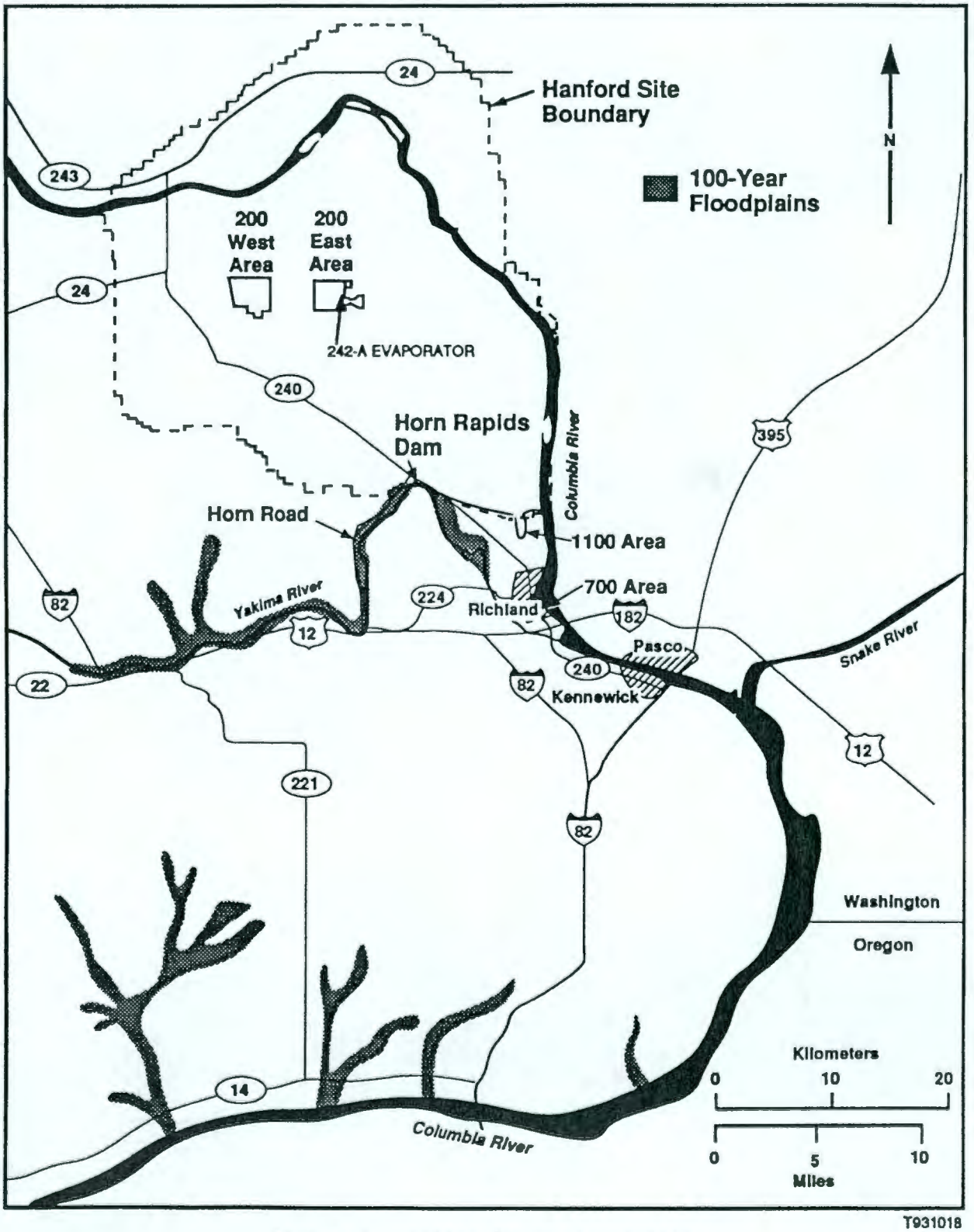

Figure 7. Yakima River Floodplain.

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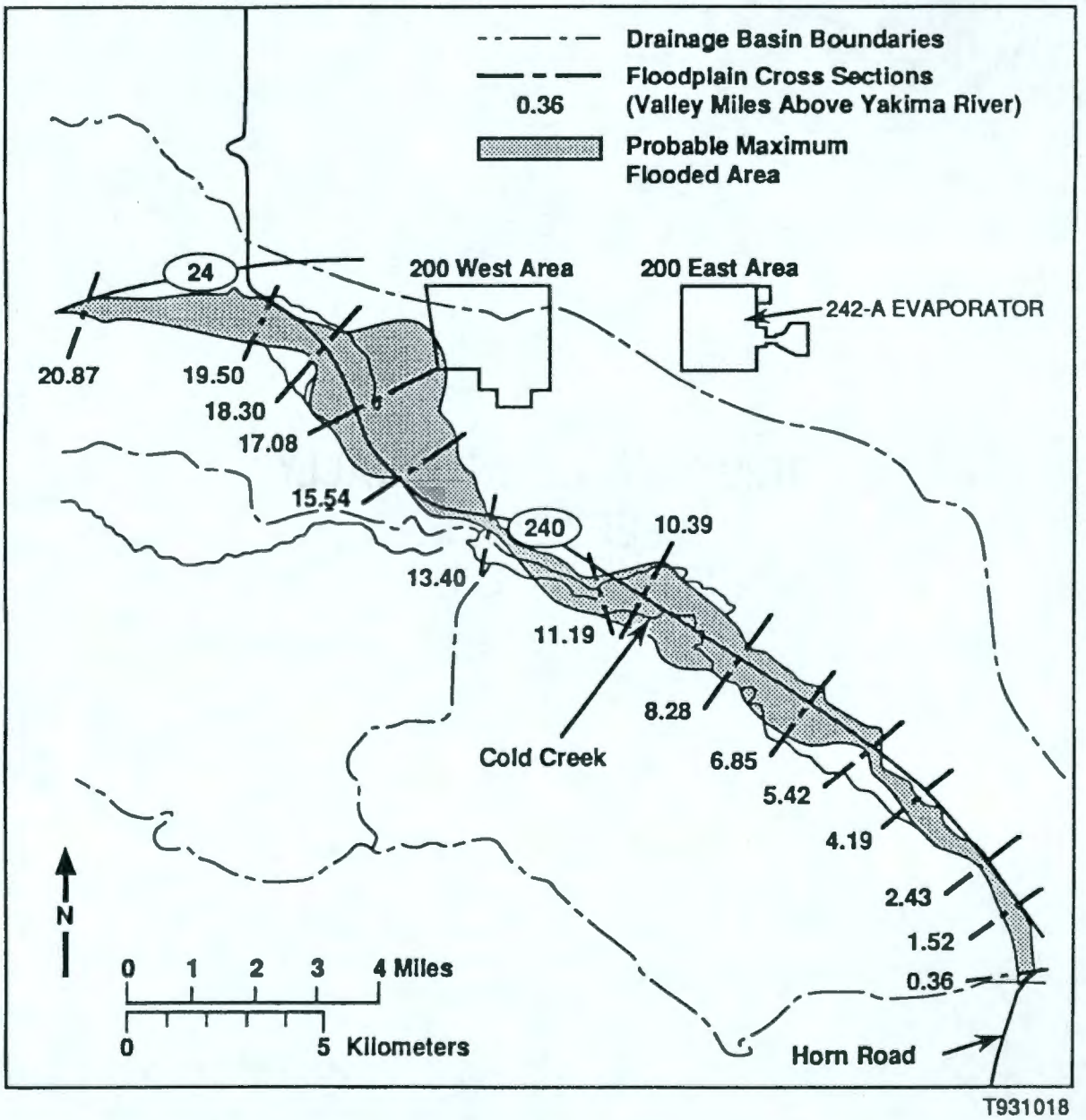

Figure 8. Cold Creek Watershed Floodplain.

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APPENDICES

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APPENDIX A

LOCATION MAPS

APPENDIX A

CONTENTS

SITE PLAN

CONTOUR INTERVAL 20 FEET DATUM IS MEAN SEA LEVEL

THIS MAP WILL NOT BE USED FOR DETERMINING EXACT LOCATIONS

NOTE

APPROVAL TO CHANGE THIS MAP MUST BE OBTAINED FROM THE ENVIRONMENTAL DIVISION, RCRA PERMITS SECTION BECAUSE THIS MAP WAS SUBMITTED WITH PERMIT APPLICATIONS TO THE WASHINGTON DEPARTMENT OF ECOLOGY.

NEXT USED ON: END ITEM

OFFICIAL RELEASE BY WHC EDT-10111
DATE MAR 17 1989

		5-11-93		5/12/93	5/11/93	REVISED PER ECN 144205	4
		11-21-91	11-20-91	11/18/91	11-18-91	REV. PER ECN-170550	3
		ENGINEER	DRAFTING	CHKD BY DATE	REV BY DATE	DESCRIPTION	
		REV. SION APPROVALS					

REVISIONS

DRAWING STATUS

DRAWING APPROVALS	DATE
APPD FOR QUALITY ASSURANCE	3/89
APPD	13 MAR 89
APPD	3-15-89
RESPONSIBLE ENGINEER R.L. MARTELL	3/89
DRAFTING APPD	
CHECKED	3/3/89
DRAWN K.D. JUNT	3/89
CLASSIFICATION NONE	BY NOT REQ'D

U. S. Department of Energy
Richland Operations Office

Westinghouse Hanford Company

GENERAL OVERVIEW OF HANFORD SITE

SCALE AS SHOWN | BLDG NO. 600 GEN | INDEX NO. 0100

DRAWING NO. H-6-958 | SHEET NO. 1 | SHEETS 1

LAST REV. 3

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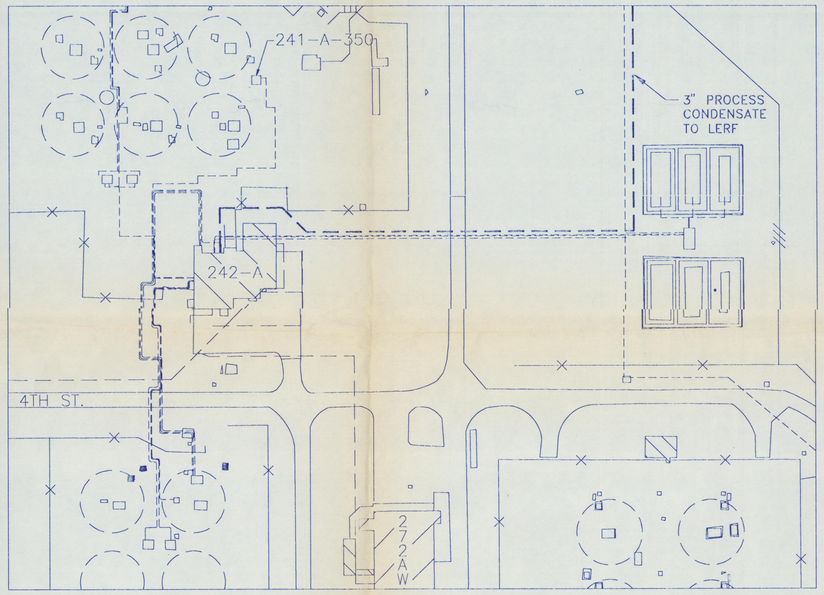
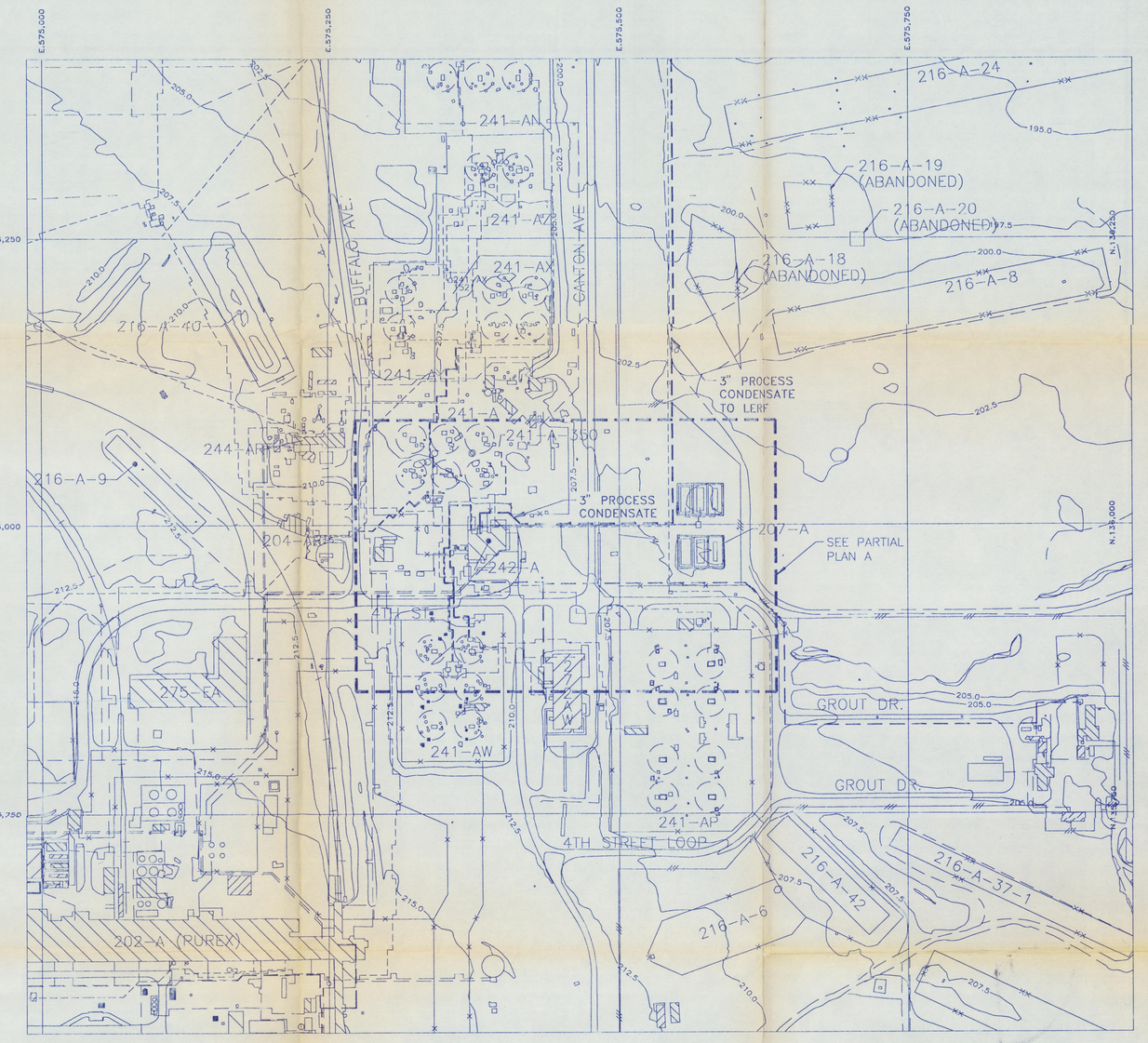
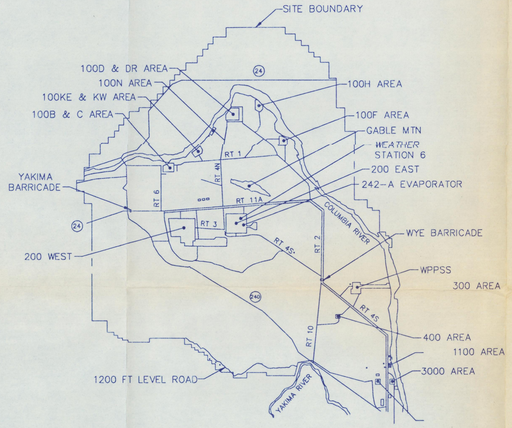


PARTIAL PLAN A

SCALE 1:1000
1 cm = 10 meters





KEY PLAN
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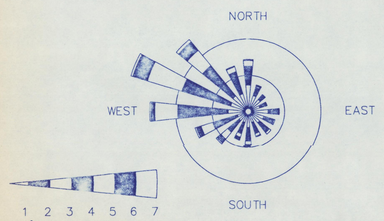

PADDLES INDICATE DIRECTION WIND IS COMING FROM.
RADIAL GRIDS REPRESENT 5.0% AND 10.0% OCCURRENCE.

WIND CLASS	MILES/HOUR
1	>1.0 – 3.0
2	4.0 – 7.0
3	8.0 – 12.0
4	13.0 – 18.0
5	19.0 – 24.0
6	25.0 – 31.0
7	32.0 +

WIND ROSE

WIND ROSE FOR: 200E AREA
% CALM WINDS = .9

PERIOD COVERED
12/01/85 – 12/31/87
STATION NO. 6

GENERAL NOTES

1. THIS MAP IS BASED ON AERIAL PHOTOGRAPHY FLOWN ON 6-24-89. THE TOPOGRAPHIC MAP WAS PREPARED BY MERRICK & COMPANY AND CERTIFIED TO MEET NATIONAL MAP ACCURACY STANDARDS. OFFICIAL COPIES OF THE MERRICK MAPS THAT SHOW THE CERTIFICATE ARE LOCATED IN THE WESTINGHOUSE ENGINEERING FILES AS DRAWING NUMBERS H-2-79476 SHEET 1 AND H-2-79477 SHEET 1 THRU 37. THE NAMES OF PHYSICAL FEATURES AND THE TITLE BLOCK OF THE H-6-10101 THROUGH H-6-10137 MAPS WERE ADDED BY WESTINGHOUSE HANFORD COMPANY.

2. WASHINGTON COORDINATE SYSTEM: THE OFFICIAL STATE PLANE COORDINATE SYSTEM AS DEFINED BY THE REVISED CODE OF WASHINGTON (RCW). THE HANFORD SITE LIES WITHIN THE WASHINGTON COORDINATE SYSTEM, SOUTH ZONE. THIS GRID COVERS THE ENTIRE SITE AND USES X (EASTINGS) AND Y (NORTHINGS) COORDINATES.

   HORIZONTAL DATUM: NAD-83 LAMBERT PROJECTIONS

   VERTICAL DATUM: NATIONAL GEODETIC SURVEY DATUM AS PROVIDED BY KAISER ENGINEERS – HANFORD.
   COORDINATES ARE SHOWN AS METERS.
   CONTOURS ARE SHOWN AS 1/2 METERS.

3. HANFORD PLANT GRID: A LOCAL GRID SYSTEM WITH ITS INITIAL POINT NORTHEAST OF THE 400 AREA. IT COVERS 200-E AND 200-W AS WELL AS GENERAL SITE WORK SUCH AS WELLS AND BURIAL GROUNDS. COORDINATES ARE SHOWN AS FEET.

4. THE PARTIAL PLAN A SHOWS THE UNDERGROUND PIPING THAT TRANSFERS WASTE FROM THE DOUBLE-SHELL TANK SYSTEM TO THE 242-A EVAPORATOR. THIS PARTIAL PLAN ALSO SHOWS THE UNDERGROUND PIPELINES FROM THE 242-A EVAPRORATOR TO THE LIQUID EFFLUENT TREATMENT FACILITY AND/OR 200 AREA EFFLUENT TREATMENT FACILITY.

LEGEND

E.576,250 N.136,000	WASHINGTON STATE COORDINATES	216-A-42	BURIAL GROUND
	INTERMEDIATE CONTOUR	242-A	BUILDING
215.0	INDEX CONTOUR	S	SIGNS
-A-A-	RETAINING WALL	MH	MANHOLE
	EDGE OF PAVEMENT	CB	CATCH BASIN
-x-	FENCE		TREES
-xx-	POST & CHAIN FENCE		STEAMLINE
	PERIMETER FENCE		BUILDINGS
-H-H-	WALL		TANKS
	DIRT ROAD OR TRAIL		RAILROAD
	PAVED ROAD		

SITE PLAN
SCALE: 1:2000

0 20 40 80 120 160 METERS

1 cm = 20 meters
PHOTO DATE: 6-24-89
CONTOUR INTERVAL: 0.5 meter

REFERENCES	
H-2-70399	PIPING PLAN 241-AW TANK FARM
H-2-70398	PIPING PLAN 241-AW TANK FARM TO 242-A BUILDING
H-2-70397	PIPING PLAN 241-A TANK FARM
H-2-69183	PIPING PLAN 242-A BUILDING AREA
H-2-69267	CIVIL PLOT PLAN
DWG NO	TITLE

REFERENCES	
H-6-10123	TOPOGRAPHICAL MAP 200E/200W AREA
H-6-10115	TOPOGRAPHICAL MAP 200E/200W AREA
REF NUMBER	TITLE
NEXT USED ON	H-6-10100

REVISIONS									
MFD REV NO	REV NO	DESCRIPTION	REV BY DATE	CHK BY DATE	DFTG APVD DATE	COG ENGR	OTHER	OTHER	APPROVALS BY/DATE
	1	REVISED PER ECN #603866	REV 7/17/91						

CADFILE N000004A CADCODE DOS:6.0/ACD2:12.0/SS

		DATE
DRAWN	PAT A. NASH	3-29-91
CHECKED	TILLY/WHITE	4-15-91
DFTG APVD	T SAMS	4-15-91
COG ENGR		
QA		
OTHER		
OTHER		
OTHER		
APVD FOR IMPLEMENTATION		
BY		
FOR		DATE

CHK PRINT ☐ DATE

U.S. DEPARTMENT OF ENERGY
Richland Operations Office
Westinghouse Hanford Company

TOPOGRAPHIC MAP 242-A EVAPORATOR

SIZE	BLDG NO	INDEX NO	DWG NO	REV
F	242-A	0110	H-13-000004	1

SCALE 1:2000 SHEET 1 OF 1

COMMENT PRINT ☐ DATE 4-23-91

DRWG NO H-13-000004 SH 1 OF 1 REV 1

54-6000-027(5/89)

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APPENDIX B

STATE ENVIRONMENTAL POLICY ACT ENVIRONMENTAL CHECKLIST
REVISION 1

The SEPA Environmental Checklist, Revision 1 updates information regarding storage of dangerous waste in tanks C-100 and C-A-1.

STATE ENVIRONMENTAL POLICY ACT
ENVIRONMENTAL CHECKLIST REVISION 1

FOR THE

NOTICE OF INTENT
FOR EXPANSION UNDER INTERIM STATUS FOR THE
HANFORD FACILITY, 242-A EVAPORATOR

AUGUST 1994

WASHINGTON ADMINISTRATIVE CODE
ENVIRONMENTAL CHECKLIST FORMS
[WAC 197-11-960]

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A. BACKGROUND

1. Name of proposed project, if applicable:

Notice of Intent (NOI) for Expansion Under Interim Status for the Hanford Facility, 242-A Evaporator. This State Environmental Policy Act (SEPA) of 1971 Environmental Checklist, Revision 1, is being submitted concurrently with the 242-A Evaporator NOI. Waste management activities at the 242-A Evaporator are planned to be expanded to allow additional dangerous waste tank storage capacity in tanks C-100 and C-A-1. In the context of the document, 'site' refers to only the physical structures of the 242-A Evaporator, whereas 'Site' refers to the Hanford Site.

2. Name of applicants:

U.S. Department of Energy, Richland Operations Office (DOE-RL) and Westinghouse Hanford Company (Westinghouse Hanford).

3. Address and phone number of applicants and contact persons:

U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Contact:

J. E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
(509) 376-2247

Westinghouse Hanford Company
P.O. Box 1970
Richland, Washington 99352

W. T. Dixon, Manager
Environmental Services
(509) 376-0428

4. Date checklist prepared:

August 1994

5. Agency requesting the checklist:

Washington State
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

6. Proposed timing or schedule: (including phasing, if applicable):

This SEPA Environmental Checklist is being submitted concurrently with the Hanford Facility, 242-A Evaporator NOI. The NOI is being submitted in accordance with the Washington State Department of Ecology (Ecology) *Dangerous Waste Regulations*, Washington Administrative Code (WAC) 173-303-281, "Notice of Intent", which require that dangerous waste facility owners and/or operators submit a NOI before submittal of a

Part A, Form 3, permit application for new or expanded dangerous waste treatment, storage, and/or disposal (TSD) units. After submittal of the NOI, there will be an opportunity for public notification and review for 150 days. Submittal of the revised Hanford Facility Dangerous Waste Part A Permit Application (Part A), Form 3, for the 242-A Evaporator will occur after the public comment period.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The 242-A Evaporator is used to treat mixed waste from the Double-Shell Tank System by removing water and most volatile organics. To support this mission, minor modifications and maintenance are expected to occur periodically at the 242-A Evaporator. Two additional TSD units will store and treat the 242-A Evaporator process condensate, the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (200 Area ETF).

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

A SEPA Environmental Checklist (Revision 0) was submitted with the Part B Dangerous Waste Permit Application for the 242-A Evaporator (DOE/RL-90-42) to Ecology on June 28, 1991.

The 242-A Evaporator was included in the *Final Environmental Impact Statement - Disposal of Hanford Defense High-Level, Transuranic and tank Wastes*, DOE/EIS-0113, U.S. Department of Energy, 1987, Richland, Washington.

Environmental information on mixed waste operations on the Hanford Site, including the 200 Areas, is contained in the *Final Environmental Impact State-Waste Management Operations, Hanford Reservation*, ERDA-1538 (Energy Research and Development Administration, 1975, Washington, D.C.)

General information concerning the Hanford Facility environment can be found in the *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415, Revision 5, December 1992. This document is updated annually by Pacific Northwest Laboratory, and provides current information concerning climate and meteorology; ecology; history and archeology; socioeconomic; land use and noise levels; and geology and hydrology. These baseline data for the Hanford Site and its past activities are useful for evaluating proposed activities and their potential environmental impacts.

9. Do you know whether applications are pending for government approvals of other proposals directly affecting the property covered by your proposal? if yes, explain.

Two additional storage (LERF) and treatment (200 Area ETF) TSD units are being constructed to store and treat the 242-A Evaporator process condensate. The LERF and 200 Area ETF have submitted individual SEPA

Environmental Checklists and dangerous waste Part B permit application documentation to Ecology for review.

10. List any government approvals or permits that will be needed for your proposal, if known.

Ecology is the lead agency authorized to approve the dangerous waste Part A, Form 3, and Part B for the 242-A Evaporator pursuant to the requirements of WAC 173-303-400 and 40 Code of Federal Regulations (CFR) Part 265.

Emissions from the 242-A Evaporator are permitted under the State of Washington Department of Health Radioactive Air Emissions Permit FF-01. The emissions are registered in *Registration for the Hanford Site: Sources of Radioactive Emissions*, DOE/RL 89-08, Revision 2, April 1993.

No other permits are known to be required at this time.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The proposed NOI is to add greater-than-90-day tank storage capacity for tanks C-100 and C-A-1. Tank C-100 is a 17,800-gallon (67,380-liter) stainless steel collection tank used to store the 242-A Evaporator process condensate until transferred to the LERF and 200 Area ETF for storage and treatment. Tank C-A-1 is a 27,267-gallon (103,217-liter) stainless steel tank that processes the mixed waste to remove the liquids and solids before discharge to tank C-100.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The 242-A Evaporator is located in the 200 East Area, the central part of the Hanford Facility, approximately 25 miles (40 kilometers) northwest of the city of Richland. The section, township, and range are as follows: Section 3, Township 12N, Range 26E. A map and site plans are included with the 242-A Evaporator NOI.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other_____.

Flat.

b. What is the steepest slope on the site (approximate percent slope)?

The approximate slope of the land at the 242-A Evaporator is less than 2 percent.

c. What general types of soils are found on the site? (for example, clay, sandy gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Soil types in the 200 Areas and around the 242-A Evaporator consist mainly of eolian and fluvial sands and gravel. More detailed information concerning specific soil classifications can be found in the *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415, Revision 5, December 1992. Farming is not permitted on the Hanford Facility.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

No filling or grading is required.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

No.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Not applicable. The existing area would not be expanded.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Not applicable. Erosion is not expected to occur during the proposed activities.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities, if known.

Minor amounts of exhaust would be generated by vehicles used to gain access to the site. Greater than 90-day tank storage is not likely to alter air emissions at the 242-A Evaporator.

b. Are there any off-site sources of emissions or odors that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to the air, if any?

Good engineering practices would be followed, and actions would comply with onsite procedures designed to protect human health and the environment. Administrative control practices will limit air emissions as well as protect worker health.

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EVALUATIONS FOR AGENCY USE ONLY

3. Water

a. Surface

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

There is no surface water body on or in the immediate vicinity of the 242-A Evaporator. Two intermittent streams traverse through the Hanford Facility; Cold Creek and Dry Creek. Water drains through these creeks during the wetter winter and spring months. No perennial streams originate within the Pasco Basin. Primary surface water features associated with the Hanford Facility are the Columbia River and Yakima River, and their major tributaries, the Snake River and Walla Walla River. West Lake, approximately 10 acres (4.05 hectares) in size and less than 3 feet (0.9 meter) deep, is the only natural lake within the Hanford Facility. Waste water ponds, cribs, and ditches associated with nuclear fuel reprocessing and waste disposal activities also are present on the Hanford Facility.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

The storage of process condensate in tanks C-100 and C-A-1 will not require any activity in or near the described waters and drainages.

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EVALUATIONS FOR AGENCY USE ONLY

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None. There would be no dredging or filling from or to surface water or wetlands.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

The water supply for the 200 Areas is pumped from the Columbia River. The storage of process condensate in tanks C-100 and C-A-1 uses relatively little of this overall withdrawal. The estimated amounts are insignificant compared to normal daily water used in the 200 Areas.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

The 242-A Evaporator is not within the 100-year or 500-year floodplains [*Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415, Revision 5, December 1992].

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

b. Ground

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

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EVALUATIONS FOR AGENCY USE ONLY

No groundwater would be withdrawn in support of this project, and water would not be discharged to the aquifer. In the vicinity of the 242-A Evaporator, the depth to groundwater is over 260 feet (79 meters).

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Raw water used to cool waste vapors in 242-A Evaporator condensers is discharged to the 216-B-3 Expansion Ponds during 242-A Evaporator operation.

Steam condensate also is discharged to the 216-B-3 Expansion Ponds during normal operation of the 242-A Evaporator. Steam condensate is collected in the 207-A steam condensate basins and pumped directly to the 216-B-3 Expansion Ponds.

Sanitary waste from the 242-A Evaporator is discharged to a septic tank and drain field system located east of the 242-A Evaporator. The proposed storage of process condensate will not impact the existing sanitary waste sewer system.

c. Water Run-off (including storm water)

1) Describe the source of run-off (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The Hanford Facility receives only 6 to 7 inches (15.2 to 17.8 centimeters) of

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

annual precipitation. Precipitation runs off the existing buildings and seeps into the soil on and near the buildings. This precipitation does not reach the groundwater or surface waters. The precipitation would not come into contact with any of the mixed waste being stored in tanks C-100 and C-A-1.

2) **Could waste materials enter ground or surface waters? If so, generally describe.**

Waste materials would not enter ground or surface waters. All waste materials would be contained.

d. **Proposed measures to reduce or control surface, ground, and run-off water impacts, if any:**

No surface, ground, or run-off water impacts are expected.

4. **Plants**

a. **Check or circle the types of vegetation found on the site.**

___ deciduous tree: alder, maple, aspen, other
___ evergreen tree: fir, cedar, pine, other
_X_ shrubs
_X_ grass
___ pasture
___ crop or grain
___ wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other
___ water plants: water lily, eelgrass, milfoil, other
_X_ other types of vegetation

The most common vegetation community in the vicinity of the 242-A Evaporator is the sagebrush/cheatgrass or Sandberg's bluegrass. Native vegetation in the immediate vicinity of the 242-A Evaporator has been eradicated. Vegetation consists primarily of cultivated ornamentals.

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EVALUATIONS FOR AGENCY USE ONLY

b. What kind and amount of vegetation will be removed or altered?

No native vegetation alteration would occur.

c. List threatened or endangered species known to be on or near the site.

None. Additional information on the Hanford Facility environment can be found in the environmental document referred to in the answer to Checklist Question A.8.

The Hanford Facility contains some federal and state listed threatened and endangered plant and animal species. Additional information on species can be found in *Hanford Site National Environmental Policy Act (NEPA) Characterization*, PNL-6415 (Revision 5, Pacific Northwest Laboratory, 1992, Richland, Washington).

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Not applicable.

5. Animals

a. Indicate (by underlining) any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, songbirds, <u>other</u>
mammals: <u>deer</u>, bear, elk, beaver, <u>other</u>
fish: bass, salmon, trout, herring, shellfish, other

Raptors (burrowing owls, ferruginous, redtail, and Swainson's hawks) are seen occasionally in the 200 East Area. Small passerines (sparrows, finches) also are present in the general vicinity of the 242-A Evaporator. Mule deer, rabbits, badgers, and coyotes occasionally are seen in the general area.

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EVALUATIONS FOR AGENCY USE ONLY

b. List any threatened or endangered species known to be on or near the site.

Two federal and state listed threatened or endangered species have been identified on the 560 square mile (1,450 square kilometer) Hanford Site along the Columbia River; the bald eagle and peregrine falcon. In addition, the state listed white pelican, sandhill crane, and ferruginous hawk also occur on or migrate through the Hanford Site. Of these five species, only the ferruginous hawk is likely to use the upland shrub-steppe habitat of the 200 Areas. Although ferruginous hawks have been seen in the general area on occasion, ferruginous hawks have not been observed to use the habitat in the vicinity of the 242-A Evaporator for perching, hunting, or nesting.

c. Is the site part of a migration route? If so, explain.

The Hanford Site is a part of the broad Pacific Flyway.

d. Proposed measures to preserve or enhance wildlife, if any:

This project contains no specific measures to preserve or enhance wildlife.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The 242-A Evaporator requires the use of steam from the Hanford Site steam plant; electricity is used for heating, lighting, and other power needs, and workers use gasoline in their cars.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

Energy consumption is not anticipated to be significant, and energy conservation features are not easily applicable to the storage of waste at the 242-A Evaporator.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

Possible environmental health hazards to workers could arise from activities at the 242-A Evaporator. The hazard could come from exposure to radioactive, dangerous, or mixed waste. Stringent administrative controls and engineered barriers are employed to minimize the probability of even a minor incident and/or accident. A chemical spill, release, fire, or explosion could occur only as a result of a simultaneous breakdown in multiple barriers or a catastrophic natural forces event.

1) Describe special emergency services that might be required.

Hanford Site security, fire response, and ambulance services are on call at all times in the event of an onsite emergency. Hanford Site emergency services personnel are specially trained to manage a variety of circumstances involving chemical and/or mixed waste constituents and situations.

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EVALUATIONS FOR AGENCY USE ONLY

2) Proposed measures to reduce or control environmental health hazards, if any:

All personnel are trained to follow proper procedures during the 242-A Evaporator treatment and storage operations to minimize potential exposure. The 242-A Evaporator has systems for ventilation, radiation monitoring, fire protection, and alarm capability. The heating, ventilation, and air-conditioning systems maintain a negative air pressure.

The 242-A Evaporator has measures in place to reduce or control environmental health hazards. These measures include containment structures and equipment, protective equipment and clothing, and operating procedures to ensure hazards are minimized. The physical security of a chain link fence around the 200 East Area and limitation of access to authorized personnel would further reduce potential exposures.

b. Noise

1) What type of noise exists in the area which may affect your project (for example: traffic, equipment, operation, other)?

While there is a minor amount of traffic, operation, and equipment noise in the vicinity, it is not expected to affect personnel at the 242-A Evaporator.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Minor amounts of noise from traffic and equipment are expected during day-shift hours.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

3) Proposed measures to reduce or control noise impacts, if any:

If Occupational Safety and Health Administration noise standards are exceeded, appropriate measures to protect workers would be employed.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties?

The Hanford Facility is a single RCRA facility identified by the U.S. Environmental Protection Agency (EPA)/State Identification Number WA7890008967 that consists of over 60 TSD units conducting dangerous waste management activities. These TSD units are included in the *Hanford Facility Dangerous Waste Part A Permit Application*. The Hanford Facility consists of all contiguous land, and structures, other appurtenances, and improvements on the land, used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of dangerous waste, which, for the purposes of the RCRA, are owned by the U.S. Government and operated by the DOE-RL (excluding lands north and east of the Columbia River, river islands, lands owned or used by the Bonneville Power Administration, lands leased or under lease obligation to the Washington Public Power Supply System, and lands owned by or leased to the state of Washington).

b. Has the site been used for agriculture? If so, describe.

No portion of the 200 Areas has been used for agricultural purposes since 1943, if ever.

c. Describe any structures on the site.

The 242-A Evaporator consists of several structures, including the 242-A Evaporator building, raw water service building, steam turbine building, steam condensate distribution building, steam condensate

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

collection basins, substation, and emergency generator. The structures generally are constructed of concrete and metal.

d. Will any structures be demolished? If so, what?

No structures are to be demolished.

e. What is the current zoning classification of the site?

The Hanford Site is zoned as an Unclassified Use (U) district by Benton County.

f. What is the current comprehensive plan designation of the site?

The 1985 Benton County Comprehensive Land Use Plan designates the Hanford Site as the "Hanford Reservation". Under this designation, land on the Hanford Site may be used for "activities nuclear in nature". Nonnuclear activities are authorized "if and when DOE approval for such activities is obtained".

g. If applicable, what is the current shoreline master program designation of the site?

Does not apply.

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

The entire Hanford Site was designated a National Environmental Research Park in 1977, for use as an outdoor laboratory for ecological research. However, the 200 Areas and the 242-A Evaporator, in particular, are located in a previously disturbed industrial area with little or no environmental significance.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

i. Approximately how many people would reside or work in the completed project?

Approximately 6 to 10 people work at the 242-A Evaporator.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Does not apply.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Does not apply.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None.

c. Proposed measures to reduce or control housing impacts, if any:

Does not apply.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No construction is proposed.

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EVALUATIONS FOR AGENCY USE ONLY

b. What views in the immediate vicinity would be altered or obstructed?

None.

c. Proposed measures to reduce or control aesthetic impacts, if any:

None.

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any:

None.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

None.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any?

None.

13. Historic and Cultural Preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No places or objects listed on, or proposed for national, state, or local preservation registers are known to be on or next to the 242-A Evaporator. Additional information concerning Hanford Site environment can be found in the environmental documents referred to in the answer to Checklist Question A.8.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

There are no known landmarks or evidence of historic, archaeological, scientific, or cultural importance at the 242-A Evaporator.

c. Proposed measures to reduce or control impacts, if any:

Does not apply.

14. Transportation

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Does not apply.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

The 242-A Evaporator is not accessible to the public and is not served by public transit.

c. How many parking spaces would the completed project have? How many would the project eliminate?

Does not apply.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

None.

g. Proposed measures to reduce or control transportation impacts, if any:

None.

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

No.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR AGENCY USE ONLY

b. Proposed measures to reduce or control direct impacts on public services, if any:

Does not apply.

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

Electricity, potable water, steam, refuse service, telephone, and septic systems are available at or near the 242-A Evaporator.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

No new utilities are proposed. No construction activities are anticipated.

SIGNATURES

The above answers are true and complete to the best of my knowledge. We understand that the lead agency is relying on them to make its decision.

James E. Rasmussen

7/29/94

James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
U.S. Department of Energy
Richland Operations Office

Date

W. T. Dixon

7/29/94

W. T. Dixon, Manager
Environmental Services
Westinghouse Hanford Company

Date

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APPENDIX C

SUMMARY OF NOTICES OF COMPLIANCE VIOLATIONS AND THE U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE RESPONSES

This summary is prepared and maintained by Westinghouse Hanford Company - Environmental Services.

ENFORCEMENT ACTIONS

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford	5/03/84	RCRA	Formal	Closed	Ecology	State Order DE 84-267 required the U.S. Department of Energy (DOE) to allow the state to access the Hanford Site to conduct formal compliance assessments of nonradioactive hazardous waste facilities.	The first comprehensive compliance inspection of Hanford by the State of Washington occurred on June 11-14, 1985. Since then, Ecology has conducted numerous formal compliance assessments of the nonradioactive hazardous waste facilities.
Hanford	12/26/84	RCRA	Formal	Closed	Ecology	State Order DE 84-720 covered several interim status compliance actions associated with nonradioactive hazardous waste facilities.	The action to achieve compliance with this order is complete. Part A applications for the facilities in question were submitted in July 1985. This date met the schedule specified in the order.
Hanford	1/29/85	SWPCA	Formal	Closed	Ecology	State Order DE 85-130 covered alleged violations of state water quality statute Revised Code of Washington (RCW) 90.48 related to Plutonium Finishing Plant (PFP) chemical sewer releases.	DOE did not acknowledge the applicability of state statutes to its activities at that time. Therefore, no specific steps were taken in response to the order, although a discussion of the circumstances was provided as a matter of comity.
Hanford	1/15/86	--	Formal	Closed	Ecology	State Order DE 85-677 covered alleged violations of state water quality statute RCW 90.48 related to Plutonium-Uranium Extraction (PUREX) chemical sewer releases.	By May 1, 1986, all facility modifications and procedural changes specified in the order were in place.
Hanford	2/06/86	--	Formal	Closed	Ecology/EPA	State Orders DE 86-132 and DE 86-133 and EPA Order 1085-10-07-3008 (followed by Consent Order with the State, DE 86-133) covered RCRA waste accumulation, groundwater monitoring, and interim status closure plans.	DOE, Richland Operations Office (RL), submitted a plan to Ecology on March 7, 1986, assuring that the storage of dangerous wastes was conducted in accordance with state regulations. Groundwater monitoring networks were installed at various facilities. The groundwater sampling programs associated with these groundwater monitoring networks are in compliance with RCRA. The required closure/post-closure plans were submitted to Ecology in November 1985.
Hanford	11/21/86	TSCA	Formal	Closed	EPA	A Complaint and Notice of Opportunity for Negotiation was issued against RL alleging violations of provisions for use of hydraulic systems in the PCB regulations. The complaint followed a May 21, 1986, inspection by the U.S. Environmental Protection Agency (EPA) that was conducted to determine whether activities were in compliance with PCB regulations.	RL responded to the Complaint on January 7, 1987, with verification that the 3760 Building reservoir was drained and refilled with new, non-PCB hydraulic oil on December 4, 1986. RL stated in the letter that they believed no further action or documentation was required.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford	10/30/87	RCRA	Formal	Closed	Ecology	State Order DE 87-295 covered state dangerous waste releases (mixed waste) to the 216-A-36B Crib.	All discharges were stopped and the crib was permanently closed to use. Wells drilled in accordance with dates set forth in the order (June 1, 1986) and regular sampling are ongoing. The Part A permit for the facility was submitted February 2, 1988.
Hanford (WHC)	4/11/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and Westinghouse Hanford Company (WHC) of a Notice of Violation within three areas based on their April 10-11, 1989, inspection of B Pond and the Nonradioactive Dangerous Waste Landfill.	Three findings were identified: (1) the need to construct at least a continuous single-strand rope fence with warning signs around B Pond and each of the three associated lobes; (2) the need to repair a 25-foot breach in the security fence surrounding the Nonradioactive Dangerous Waste Landfill; and (3) the need to evaluate the wooden pier over the 216-A-29 Ditch for stability and to establish load limits for its use. The single-strand rope fence with appropriate warning signs has been installed around B Pond and its three lobes. The fence at the Nonradioactive Dangerous Waste Landfill has been repaired. The wooden pier over the 216-A-29 Ditch has been taken out of service, "DANGER - KEEP OFF" signs have been posted, and the structures have been barricaded.
Hanford (WHC)	6/12/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and WHC of a Notice of Violation within two areas based on their June 12, 1989, inspection of the 183-H Basins and 216-S-10 Pond and Ditch.	Two findings were identified: (1) the need to construct at least a continuous single-strand rope fence with appropriate warning signs around the 216-S-10 Pond and Ditch before August 15, 1989; and (2) the need to stabilize two corroded and leaking drums containing mixed waste located at the 183-H Basins. A single-strand barrier rope was installed with the appropriate warning signs around the 216-S-10 Pond and Ditch. The contents of the leaking drums were removed and repackaged in appropriately prepared drums. An inspection was conducted on the other drums containing dangerous waste at the 183-H facility and no other irregularities were noted. The Central Waste Complex, which receives 183-H dangerous waste drums, was inspected and no irregularities were noted. An analysis also was conducted on the probable cause of the corrosive material found on the drums. The results were presented to Ecology.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	7/20/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and WHC of a Notice of Violation within three areas based on their July 20, 1989, inspection of the 216-A-29 Ditch, 216-B Pond, and the Central Waste Complex.	Three findings were identified: (1) the need to construct, at a minimum, a continuous single-strand chain fence with appropriate warning signs around the 216-A Ditch by September 30, 1989; (2) four radiation warning signs were found unsecured on the ground near the 216-A-29 Ditch and 216-B Pond facilities; and (3) 10 waste drums at Central Waste Complex were found to have exceeded the 90-day accumulation period while at the generating facility. A continuous single-strand barrier was installed around the 216-A-29 Ditch and 216-B Pond. The unsecured signs have been reposted. Periodic inspections will be conducted to identify necessary corrective actions such as unsecured signs. The 10 waste drums that exceeded the 90-day accumulation period were identified as originating from PFP. These drums were partially characterized and transferred to the Central Waste Complex for proper storage. A letter identifying the dangerous and mixed waste satellite and less-than-90-day accumulation areas on the Hanford Site was transmitted to Ecology.
Hanford (WHC)	12/10/90	RCRA	Formal	Closed	Ecology	On December 10, 1990, Ecology notified RL and WHC of a Notice of Noncompliance for returning 68 problem drums from the Central Waste Complex to the generator, the 183-H Basins. Ecology did not take any formal action, but requested that the 68 drums be repackaged and returned to the Central Waste Complex before December 25, 1990.	RL received concurrence from Ecology to extend the deadline to January 15, 1991. The repackaging of the drums was initiated on December 18, 1990; however, this effort was hampered by unfavorable weather conditions. Eight additional working days were lost due to high winds, snow, and rain. All 68 of the problem drums were subsequently repackaged and returned to the Central Waste Complex by January 25, 1991. Ecology was both verbally notified by WHC and officially notified by RL of this additional delay.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	--	NPDES	Informal	Closed	Fisheries	In March 1991, RL began construction of a new filter backwash pond in the 300 Area. A component of this construction project was a new outfall to the Columbia River. Army Corps of Engineers' approval was secured for the outfall. An NPDES permit has been applied for, and all the necessary NEPA documentation is in place; however, RL failed to apply for the necessary hydraulics project permit approval from the Washington State Department of Fisheries (Fisheries) and for a temporary water quality modification permit from Ecology before construction of the outfall.	Fisheries performed an inspection of the construction project in June 1991. As a result of the inspection, Fisheries recorded this activity as a violation because a portion of the construction was performed below the high-water mark on the Columbia River without permit. RL was instructed by Fisheries to do the following: (1) place a screen on the outlet of the outfall to prevent fish from trying to swim up the pipe; (2) repair the damage to the vegetation that occurred during construction; and (3) contact Ecology on whether a water quality modification permit should be applied for after construction is complete. A screen was placed on the outfall in December. A new hydraulic project permit has been received to allow for new trees to be planted. Trees were planted to replace the damaged vegetation during March. Ecology has indicated construction of the outfall has already occurred. Although this was considered a violation, no citation was issued to RL or its contractors. Fisheries also stated that there was no significant environmental impact due to the construction of this outfall.
Hanford (WHC)	5/14/92	RCRA	Informal	Open	Ecology	Ecology issued an inspection report for Tank 241-SY-101 that alleges RL was in violation of State Dangerous Waste Regulations (WAC 173-303). These violations included the failure to inspect monitoring systems, failure to provide and operate adequate leak detection, failure to allow inspectors access to training records, and failure to properly identify personnel in the training plan.	RL has issued three responses to the state regarding the alleged violations according to the schedule in the inspection report. RL has completed all corrective actions as required by Ecology. No formal notification indicating satisfactory completion of the corrective actions has been received by Ecology.
Hanford (WHC)	7/16/92	RCRA	Informal	Closed	Ecology	Ecology issued an inspection report for an overflow of PUREX tank F18. The primary violations that were alleged included lack of spill reporting, failure to inspect monitoring systems, and lack of adequate secondary containment and overfill prevention controls.	Letter sent April 28, 1993, from Ecology to RL and WHC stating formal closure of this item.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	8/05/92	CAA	Informal	Open	DOH	DOH conducted an audit of 200 East Area Tank Farms during March and April 1992 and identified 21 findings, 10 observations, and 9 best management practices related to airborne radioactive emissions from the tank farms.	The primary findings centered around potential shortcomings in compliance with the reasonably available control technology engineering standard. RL has completed corrective actions to close these findings. A response was sent to DOH in November 1992 (correspondence number 9205905R1), and RL is awaiting DOH response.
Hanford (WHC)	9/22/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for T Plant that alleges RL and WHC were in violation of WAC 173-303. These violations included failure to meet waste generator and accumulation standards such as recordkeeping, inspections, use and management of containers, waste designation, and spills and discharges.	RL and WHC have issued a response according to the schedule described in the inspection report. Most corrective actions have been completed. Ecology has noted T Plant's efforts to resolve their violations and has officially closed this enforcement action.
Hanford (WHC)	9/29/92	CAA	Informal	Open	DOH	DOH issued a report detailing 15 action items from an investigation concerning an unresolved safety question at the B Plant main stack ventilation system.	These action items included providing a response to the following: improper notification of DOH for emission control system modifications, potentially inadequate emission control system, and improper ventilation sealing systems. A response was provided by RL within the designated 45-day time period. Five of the action items have been completed to the satisfaction of DOH. Closure of the remaining 10 action items will occur after completion of corrective actions and ongoing negotiations with DOH.
Hanford (WHC)	10/06/92	CAA	Informal	Closed	DOH	DOH issued a report for an audit performed at the Uranium Trioxide Facility that identified five minor findings.	These findings were related to sampling data collection, data reporting, and monitoring equipment calibration. RL issued a response within the designated 45-day time period. Two of the findings have been closed to the satisfaction of DOH. DOH sent a letter to RL (correspondence #9401923) dated February 11, 1994, to close the remaining items identified during the surveillance.
Hanford (WHC)	10/23/92	TSCA	Formal	Closed	EPA	The EPA issued a Notice of Noncompliance based on an inspection conducted in September 1991. One violation related to the cleanup of a PCB spill was identified.	On November 13, 1992, RL responded to the Notice of Noncompliance. RL stated in the response that the cleanup of the PCB spill was completed on September 28, 1991, not October 1, 1991, as alleged in the Notice of Noncompliance. RL also outlined corrective actions to ensure that cleanup of PCB spills are initiated and completed within the required 48 hours. On November 25, 1992, EPA sent a letter to RL stating they were satisfied with RL's response and corrective actions and closed the issue.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (KEH)	10/27/92	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter to RL and Kaiser Engineers Hanford (KEH) alleging violations with WAC 173-303. These violations included failure to meet the waste generator and accumulation standards such as waste designation, personnel training, recordkeeping, and the use of a management of containers.	RL and KEH issued a response within the designated time period. A letter mailed on January 14, 1993, from Ecology to RL formally closed this item.
Hanford (PNL)	10/30/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for the 305-B storage facility alleging RL and Pacific Northwest Laboratory (PNL) are in violation of WAC 173-303.	The violations included improper waste designation, an inadequate contingency plan, an inadequate waste inventory, improper container labeling, and improper storage of waste according to the fire code. RL and PNL issued a response that disputed all findings. These findings were resolved in a letter sent from Ecology to RL on April 7, 1993.
Hanford (WHC)	11/12/92	RCRA	Informal		Ecology	Ecology issued a letter alleging that RL and WHC are in violation of WAC 173-303. These violations included leak detection, lack of secondary containment, delayed notification and reporting, and inadequate personnel training at the single-shell tanks.	Ecology also prepared a Tri-Party Agreement change control form establishing enforceable milestones to address the violations. RL and WHC have issued a response requesting that negotiations begin to address the proposed milestones.
Hanford (WHC)	1/15/93	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter for issues related to the storage of mixed waste in the 241-SY-101 Tank Farm.	The violations noted included exceeding the waste accumulation limit of 120 days, and compliance problems associated with generator waste storage. RL and WHC have issued a formal response. No additional actions are necessary.
Hanford (WHC)	2/02/93	CAA	Formal	Closed	DOH	DOH issued a Notice of Violation (NOV) for radioactive air emission issues related to the proposed fuel encapsulation activities at the 100-KE fuel storage basins.	The NOV stated that RL and WHC have initiated work that directly supports fuel encapsulation without approval of DOH. The NOV formally directed RL and WHC to stop all work at the 100-KE Basins immediately. RL and WHC formally responded to the NOV, and a Notice of Construction permit was issued in the fall of 1993.
Hanford (WHC)	2/03/93	CAA	Formal	Super-ceded	EPA	EPA issued a Compliance Order to RL and its contractors alleging noncompliance with the National Emission Standards for Hazardous Air Pollutants for radionuclides.	EPA and RL negotiated a Federal Facility Compliance Agreement (FFCA) on February 7, 1994, to allow RL to confirm compliance or meet the compliance requirements of 40 CFR 61, Subpart H. The FFCA superceded the Compliance Order and this will no longer be tracked as an open item.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	3/10/93	RCRA	Formal	Open	Ecology	Ecology issued an Order and Notice of Penalty Incurred and Due for failure to adequately designate approximately 2,000 containers of solid waste.	The Notice of Penalty stipulated a penalty of $100,000. RL disputed portions of the Order and Notice of Penalty. RL and Ecology have agreed to resolutions to the disputed portions, and these resolutions have been agreed to by the Washington State Pollution Control Hearing Board, which issued a Settlement Agreement modifying the Order and Notice of Penalty. The Settlement Agreement for the Compliance Order required submittal of a Waste Analysis Plan (WAP) to confirm or complete the designation of the waste in question. Extensive negotiations regarding the content of the WAP occurred between RL and Ecology, and final approval was granted by Ecology on November 1, 1993. Confirmation or completion of the waste designation, following the process established by the WAP, must be completed by September 1, 1994. Negotiations regarding an alternative to the payment of the $100,000 penalty have resulted in an agreement that allows RL to set up an Environmental Protection Scholarship in the amount of $40,000 at Columbia Basin College, and payment to PNL and the Washington Department of Wildlife to plan for and carry out a sagebrush revegetation effort on the Hanford Arid Lands Ecology Reserve. WHC/RL are ahead of schedule and anticipate completion of this by the end of the first week in August 1994.
Hanford (WHC)	5/12/93	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for alleged violations related to a spill of ethylene glycol at the 309-E Building to the 300 Area Process Trench.	The alleged violations were related to immediate reporting of the incident and access to information. RL prepared a response to this incident within the required time period. RL has completed all corrective actions as required by Ecology. No formal notification indicating satisfactory completion of the corrective actions has been received from Ecology.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	5/24/93	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for alleged violations of various regulations related to tank system compliance at Tank 241-BX-111.	RL has prepared responses to the letter and has committed to pumping the remaining liquids from the tank. Liquid pumping was initiated in October 1993 and initially was expected to be completed in January 1994. This date has been extended to April 30, 1994. After all the liquid was believed to be pumped, pictures were taken and a pool of free liquid was found to be remaining. This was pumped, and it amounted to about 5,000 gallons of supernatant. As of July 12, 1994, all the supernatant liquid had been removed and pumping was continuing on the interstitial liquid. WHC expects this last stage of pumping to be done by the end of July.
Hanford (WHC)	7/09/93	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for alleged violations of the generator accumulation standards of WAC 173-303-200 at T Plant.	These alleged violations occurred during the repackaging of unknown containers that were generated in Tank Farms. RL has completed all corrective actions as required by Ecology. Additional correspondence from Ecology requested more information related to six repackaged waste containers. On December 2, 1993, RL submitted this information to Ecology.
Hanford (WHC)	8/24/93	RCRA	Informal	Open	Ecology	Ecology was notified on August 12, 1993, of a request to extend the 90-day accumulation period for T Plant waste because of the Tank Farms safety stand down. Ecology denied the extension because they believed the necessary requirements were not satisfied in a letter they received August 18, 1993, from RL.	Because the extension was denied, Ecology issued a Compliance Letter alleging violations of WAC 173-303-200, stating "T Plant failed to ship waste offsite within 90 days, and WHC/RL failed to take actions necessary to qualify for an extension to the 90-day accumulation period." The voluntary compliance letter included corrective actions.
Hanford (WHC)	10/15/93	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter for alleged violations of the transporter requirements of WAC 173-303-190 at the Plutonium-Uranium Extraction (PUREX) Facility.	These alleged violations occurred while the waste was being stored in a tank trailer pending approval from Idaho to accept the waste. RL transmitted a letter to Ecology on June 28, 1994 (9404281), stating that items in the compliance letter are closed. No formal notification indicating satisfactory completion of the corrective actions has been received from Ecology.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	10/18/93	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter for alleged violations of the treatment, storage, and disposal requirements of WAC 173-303 at PUREX.	The primary violations involved not removing liquid from secondary containment within 24 hours and storing wastes in a unit not permitted for storage. These alleged violations occurred while waste was being stored in Tank F18 and Tank F16. Transfer of waste from Tank F16 and Tank F18 to Tank Farms was initiated on October 22, 1993. A total of six transfers were required to remove the waste from Tank F16. The final transfer from Tank F16 was completed on November 1, 1993. RL provided Ecology with a letter on December 14, 1993, to document that Tank F16 was emptied. The letter stated that "with the removal of waste from Tank F16 completed, RL considers this action closed."
Hanford (WHC)	10/18/93	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter for alleged violations of the generator accumulation requirements of WAC 173-303-200.	The violations resulted from a reclassification of four process tanks at the Plutonium Reclamation Facility (PRF) as waste accumulation tanks. Ecology required the implementation of a waste tracking system, that tanks be labeled as hazardous waste accumulation tanks, and providing direction to PRF Operations regarding the regulatory status of PRF waste tanks. The first item has been completed. RL sent a letter to Ecology in late November 1993, which requested information on two exclusions in WAC 173-303-071(3) that may allow reclassification of PRF waste tanks to non-RCRA status. On January 13, 1994, Ecology responded with a letter that stated the above-mentioned tanks were process tanks and, therefore, not subject to generator waste accumulation requirements under the WAC.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	10/26/93	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter for alleged violations of the generator accumulation requirements of WAC 173-303-200.	The Compliance Letter resulted from a Hanford-wide inspection of temporary storage and satellite accumulation areas. Several findings and recommended corrective actions were noted in the inspection. WHC has completed these corrective actions. At the 1164 Facility, one finding was identified regarding container records. On November 5, 1993, a copy of the record was filed at the facility. The final report to close this item was issued on December 16, 1993. A letter from Ecology on February 17, 1994, formally closed this item. At the 1713-H Satellite Storage Area, three findings were identified, and two findings at the 321 Facility were identified. With regard to the 1713-H Facility, RL sent a letter to Ecology on November 15, 1993, listing the corrective actions taken and stating that RL believed these actions "fully resolve the inspection findings." With regard to the 321 Facility, this was a temporary facility that has been closed, thereby eliminating this issue.
Hanford (WHC)	10/29/93	CAA	Informal	Open	DOH	DOH issued a report of a surveillance conducted at PUREX during August 1993 that identified one finding related to a lack of auditable procedures and three Best Management Practices (BMP), one related to tracking sampling instrument serial numbers by location, and two related to clarifying sampling procedures.	RL is identifying corrective actions to address the finding and the three BMPs. A response to the surveillance also is being prepared.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	11/17/93	RCRA	Informal	Open	Ecology	On November 17, 1993, Ecology issued a Compliance Letter alleging inadequate controls for preventing nonroutine releases of hazardous substances to the environment from WHC-managed facilities in the 300 Area. The subject letter was received following a release of ethylene glycol to the 300 Area Process Sewer from the 309 Building in October 1993.	RL requested WHC to submit a written response to the subject letter by December 22, 1993 (this date was amended to December 30, 1993). On December 30, 1993, WHC responded to RL with a letter that provided an assessment of the potential for non-routine releases of hazardous substances to the environment from the 300 Area WHC- and KEH-managed facilities. The assessment was conducted by performing a walkdown of the facilities. Where hazardous materials were present, the control systems for preventing releases to the environment were evaluated. If the control systems were found to be inadequate, plans and schedules to upgrade the systems were developed. The planned upgrades are scheduled for completion before the start of the 300 Area Treated Effluent Disposal Facility, projected for December 1994. The assessment provided to RL included descriptions of each affected facility and the action required to correct the situation.
Hanford (WHC)	11/17/93	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for alleged violations in implementing the WAP.	On November 17, 1993, Ecology met with RL to discuss alleged deviations from Section 1.4 of the WAP, which requires RL and Ecology to approve changes. Also discussed was a concern regarding waste management training, a request for desk instructions, and a list of responsible persons. The information originally was requested for December 1, 1993. Ecology agreed to delay the response until December 8, 1993, and RL issued the response on that date. The response states that all proposed changes to the WAP will be communicated to Ecology as requested. The letter also addressed the other concerns Ecology had, and made recommendations to assemble a technical team to deal with issues surrounding implementation of the WAP before they became concerns.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	12/06/93	CAA	Informal	Open	DOH	DOH issued a Compliance Letter following a surveillance on October 6, 1993, at the Fast Flux Text Facility (FFTF), which identified two findings and two BMPs. The letter requested a response from RL within 45 days.	One of the findings was that calibration tags were not on monitoring instrumentation, and the other finding noted that some monitoring instruments had difficulty remaining in calibration because of vendor problems. One BMP stated that the Reactor Service Building had limited control and monitoring technologies to detect or control a release. The other BMP stated that the sampler flow measurement equipment and procedures created uncertainty in the accuracy of the measurement. Recommended corrective actions were provided in the Compliance Letter. WHC provided a response to RL on January 14, 1994, and on March 2, 1994, RL provided DOH a response to the findings and BMPs.
Hanford (WHC)	12/07/93	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for allegations that improvements (target actions) to be performed at T Plant as part of the Dangerous Waste Part A Permit Application were found to be either incomplete or unsatisfactory during a December 2, 1993, inspection.	This target action, "Implement Periodic Visual Inspection and Static Leak Test Program for 2706-T and 211-T Tanks," was to be completed by October 1993. Ecology has required implementation of effective visual inspection and leak test programs for the 2706-T and 211-T sumps by December 15, 1993. Ecology also required the completion of three corrective actions by January 15, 1994; specifically, repair of the backflow preventer leaking to the 2706-T sump, repair of the leak detection device for 2706-T, and report on the progress of installing or instituting leak detection for the 211-T sump. RL is preparing a response that disputes all the findings noted by Ecology. No corrective actions are planned at this time.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	12/13/93	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for an inspection conducted November 18-22, 1993, at the Transuranic Waste Storage and Assay Facility (TRUSAF) to determine compliance with interim status requirements under WAC 173-303, and to status current activities with respect to the Dangerous Waste Part B Permit Application.	Alleged violations included (1) failure to maintain emergency equipment in accordance with the facility contingency and emergency plan, (2) failure to maintain operating records in a manner sufficient to locate wastes within the facility, (3) failure to label containers with hazardous waste labels or in a manner to adequately identify major risks associated with the contents of the containers, and (4) failure to store containers within a compliant secondary containment system. The Compliance Letter stated that RL and WHC needed to correct these findings by March 18, 1994. On February 4, 1994, RL sent a letter to Ecology providing a status of the four corrective actions. RL considers the first two items closed. RL has requested an extension to April 30, 1994, for the third item, and stated that the fourth item would be completed by March 14, 1994. A unit managers' meeting was held on June 1, 1994, which provided information indicating the final two items have been completed. Since all corrective actions have been completed, this item is closed.
Hanford (WHC/PNL)	12/17/93	CAA	Informal	Open	DOH	DOH conducted an audit of air monitoring instrumentation adequacy and calibration on June 28 - July 2, 1993. DOH believes past audits and surveillances have identified instrumentation out of calibration.	The audit revealed two findings, five observations, and five BMPs. DOH requested RL's response, including a corrective action plan, by February 20, 1994. On February 16, 1994, WHC provided RL with a response to DOH (#9451044D). The response stated that one finding would be resolved by March 18, 1994, and the other by April 30, 1994. Completion dates were provided for the findings and BMPs not already resolved.

Facility	Date	Subject	Category	Status	Agency Contact	Summary	Comments
Hanford (WHC)	1/27/94	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter for alleged violations identified during an inspection on December 9, 1993, at the Hanford Fire Department to determine compliance with contingency plan requirements under WAC 173-303 for hazardous and/or mixed waste facilities.	The sections of the WAC that RL and WHC were alleged to be out of compliance with are 173-303-350(2), -350(3), and -350(4). The Compliance Letter stated that contingency plans for 2715EA, 1177, 321, 384, and 284W did not incorporate the WAC requirements. Additionally, the letter stated that copies of contingency plans for 284E, 284W, and 2715EA were not kept at the Hanford Fire Department as required, and they were not on the Hanford Local Area Network (HLAN). The Compliance Letter requested corrective actions to be complete by April 15, 1994. On March 23, 1994, WHC provided RL with a letter for Ecology in response to these allegations, and RL sent the letter to Ecology on March 28, 1994. The letter presents a revised RL/WHC contingency planning program, and outlines the corrective actions RL will take by May 31, 1994, to close this item. WHC/RL completed corrective actions as planned according to schedule.
Hanford (WHC)	2/23/94	RCRA	Informal	Closed	Ecology	Ecology issued a Compliance Letter alleging violations of facility recordkeeping requirements for the Backlog Waste Program. The alleged violations resulted from an Ecology inspection on February 18, 1994, when Ecology requested copies of training records.	The alleged violations are summarized below. 1) RL and WHC "failed to make training records available for inspection ... to verify that employees involved in the backlog waste program have received training..." 2) RL and WHC "failed to make training records required by Chapter 173-303-330 WAC available for inspection at all reasonable times per Chapter 173-303-380(3[a])." Ecology's corrective actions stated in the "voluntary compliance letter" involve providing the requested training records to Ecology and then maintaining the appropriate training records in the 200 West Area, and keeping them available for future inspections. On April 14, 1994, Ecology sent a letter to RL and WHC stating that their investigation of training record accessibility for the Backlog Waste Program was completed and the issue has been closed.

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Hanford (COE)	3/09/94	RCRA	Formal	Open	Ecology	Ecology issued an Order (No. DE 94NM-063) and Notice of Penalty Incurred and Due (No. DE 94NM-062) against the U.S. Army Corps of Engineers (COE) for disposing dangerous waste at the Richland Landfill, and against DOE for not providing adequate dangerous waste training to COE employees.	Ecology has assessed a penalty of $9,500 against DOE and a $6,000 penalty against COE. The fines stem from the accidental dumping of dangerous waste at the landfill as part of the cleanup activity ongoing at the North Slope. The incidents occurred late in 1993. On April 15, 1994, Ecology sent a letter to RL and COE stating satisfaction that the corrective items identified in the order had been completed, and approved the restart of dangerous waste management work on the North Slope. Ecology also requested in the letter that before the generation or potential generation of hazardous or mixed waste at identified past-practice waste sites, that Waste Control Plans be submitted to them for approval. Ecology stated that the "letter serves as a notice of completion of Order requirements," except for the ongoing requirement of the Waste Control Plans, and stated that the "entire case will be resolved upon payment" of the Penalty.
Hanford (WHC)	4/07/94	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter to RL and WHC alleging noncompliance with WAC 173-303-330, Personnel Training.	The allegations followed an inspection conducted at tank farms March 17-18, 1994, to determine compliance with generator requirements. The inspector stated that at the time of the inspection, a random sample of training records was selected and that approximately half of those were found to be deficient. The action item in the letter called for RL and WHC to review the training of tank farms personnel by July 1, 1994, and to complete and document all required training. On June 29, 1994, RL sent Ecology a letter (9404279) stating that 95 percent of the tank farms personnel had completed the required training, and that all remaining personnel would be limited to work not directly affecting dangerous waste management activities until their training was completed. Ecology conducted a follow-up inspection on July 19, 1994, and indicated satisfaction with this issue and said they consider this closed.

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Hanford (WHC)	4/14/94	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter to RL and WHC on April 14, 1994, which followed an inspection conducted on February 7-8, 1994, to assess completion of Milestones 21, 22, and 23 of the Tri-Party Agreement. The Compliance Letter alleged seven violations of WAC 173-303: (1) WAC 173-303-300, General Waste Analysis; (2) -380, Facility Recordkeeping; (3) -310, Security; (4) -630, Use and Management of Containers; (5) -320, General Inspection; (6) -350, Contingency Plan and Emergency Procedures; and (7) -640, Tank Systems.	Ecology's concerns were centered around RCRA interim status requirements being relaxed on the facilities that were inspected, which are scheduled for closure or are undergoing a change in mission. Ecology's concerns are that relaxed management of hazardous waste during these periods may cause a threat to human health or the environment. Five corrective actions were included in the letter, three to be completed within 30 days, two within 60 days, and one within 180 days.
Hanford (WHC)	5/18/94	RCRA	Informal	Open	Ecology	Ecology issued a Compliance Letter to RL and WHC on May 18, 1994, that followed a dangerous waste compliance assessment of the PUREX and UO, facilities. The assessment was conducted to "determine current compliance with interim status requirements ... and to review applicability and appropriateness of requirements for currently permitted vessels, and those vessels that will be added to the PUREX Part A Permit Application." The letter identified 7 findings, 5 observations, and 11 requirements.	The letter states that "this investigation was performed under the guise of an environmental assessment rather than a compliance inspection. However, failure to correct the deficiencies may result in a compliance action pursuant to the authorities granted to Ecology by RCW 70-105." Because of this language, RL/WHC decided to handle this letter like a voluntary compliance letter. On June 27, 1994, RL issued a letter that responded to the findings, observations, and requirements. The letter responses either disputed the findings, etc., or agreed with them and provided corrective actions with completion dates.